

Appendix D
SUMMARY OF PUBLIC SCOPING DOCUMENTS

Appendix D

SUMMARY OF PUBLIC SCOPING COMMENTS

D.1 PUBLIC SCOPING PROCESS

As a preliminary step in the development of an environmental impact statement (EIS), regulations established by the Council on Environmental Quality (CEQ) (40 CFR 1501.7) and the U.S. Department of Energy (DOE) require “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” The purpose of this scoping process is: (1) to inform the public about a proposed action and the alternatives being considered, and (2) to identify and/or clarify issues that are relevant to the EIS by soliciting public comments.

On October 19, 2006, the National Nuclear Security Administration (NNSA), a semi-autonomous agency within DOE, published a Notice of Intent (NOI) in the *Federal Register* announcing its intent to prepare a *Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement* (71 FR 61731). During the *National Environmental Policy Act* (NEPA) process, there are opportunities for public involvement (see Figure D.1-1). The NOI listed the issues initially identified by DOE for evaluation in the Complex Transformation¹ Supplemental Programmatic Environmental Impact Statement (SPEIS). Public citizens, civic leaders, and other interested parties were invited to comment on these issues and to suggest additional issues that should be considered in this SPEIS. NNSA accepted comments during the 90-day public scoping period via U.S. mail, e-mail, facsimile, and in person at public scoping meetings.

NNSA held public scoping meetings near each of the nine sites potentially affected by the alternatives and in Washington, DC. Meetings were held as shown on Figure D.1-2:

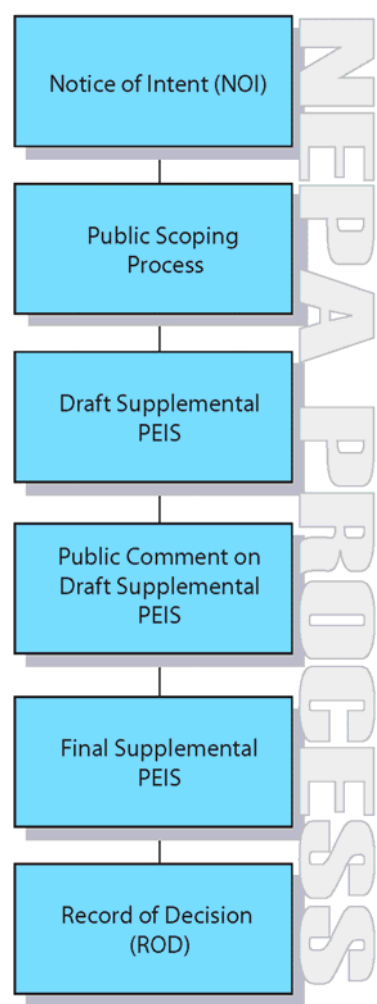


Figure D.1-1

¹ In the NOI, this supplement was referred to as the “Complex 2030” SPEIS.

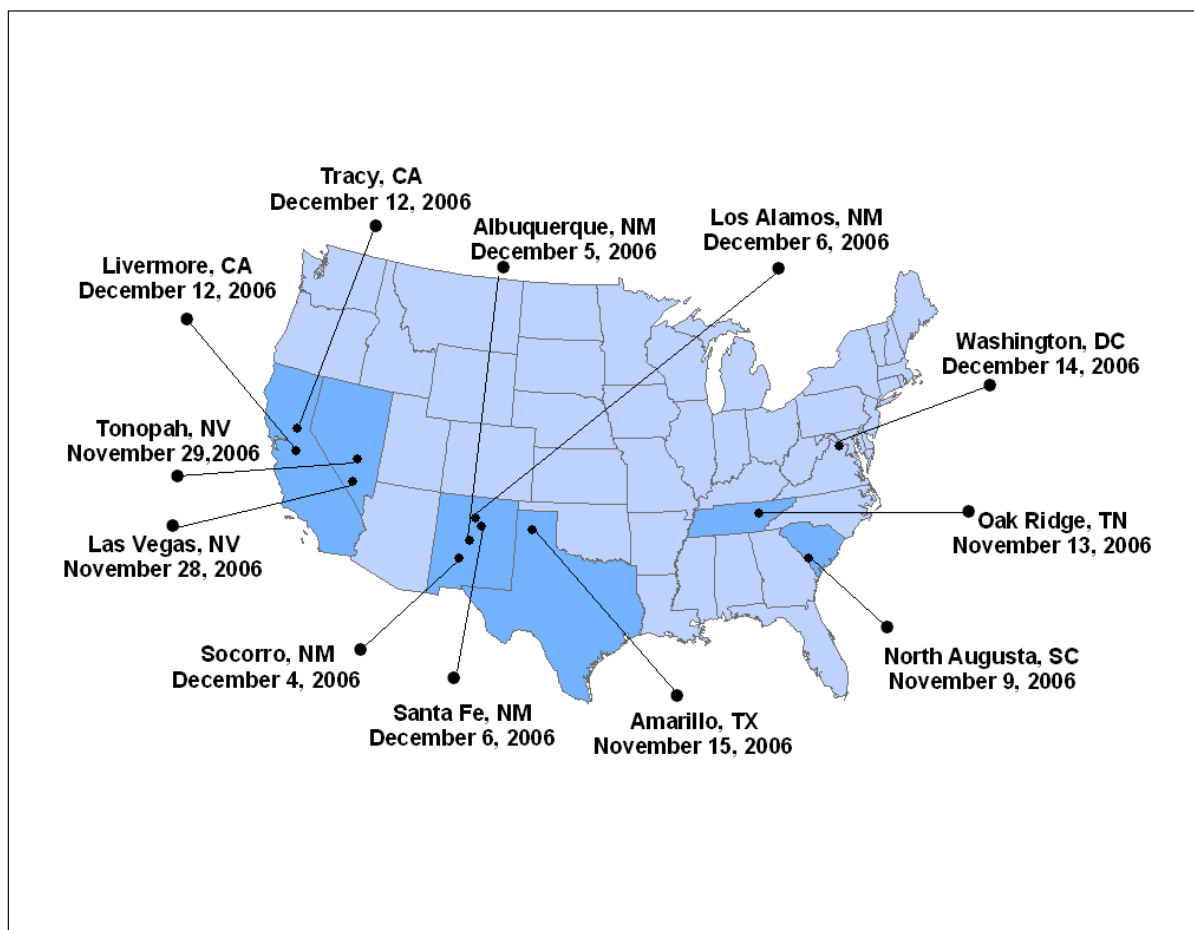


Figure D.1-2—Public Scoping Meeting Locations and Dates

DOE chose an interactive format for the scoping meetings. Each meeting began with an open house session where the public could speak to DOE representatives followed by a presentation by a DOE representative who explained the background, purpose and need for agency action, the alternatives, and the NEPA process. Following the presentation, members of the public were given the opportunity to provide oral comments. These oral comments were recorded, and a transcript for each meeting was produced.

D.2 ISSUE IDENTIFICATION AND COMMENT DISPOSITION

Comments received during the scoping period were systematically reviewed by DOE. Where possible, comments on similar or related topics were grouped under comment issue categories as a means of summarizing the comments. Table D.2-1 lists topics (“bins”) used to categorize comments. More than 33,000 comment documents were received from individuals, interested groups, and Federal, state, and local officials during the public scoping period.

Table D.2-1—Comment Bin List

Topics and Subtopics	
1.	Policy
A.	Existing Treaties—general
B.	Presidential Directives, Public law, and current policies
C.	Nuclear Posture Review
D.	Comprehensive Test Ban Treaty
E.	Treaty on the Non-Proliferation of Nuclear Weapons
F.	Moscow Treaty
G.	International Policies
H.	Nuclear Waste Policy Act
2.	NEPA Process
A.	General NEPA process
B.	Whether to prepare a new PEIS versus a supplemental PEIS
C.	Stakeholder involvement
D.	Scoping process—notification
E.	Length of scoping period, number and location of scoping meetings
F.	Scoping meeting format and scoping meeting fact sheets
G.	Scoping comments
H.	Availability of information
I.	NEPA compliance
J.	NEPA conflict-of-interest
3.	Programmatic Purpose and Need
A.	Purpose and need—general
B.	Relationship to Stockpile Stewardship and Management
C.	Question the need for Complex Transformation
4.	Programmatic No Action Alternative
A.	No Action Alternative—general
B.	No Action Alternative needs to be a true no action
C.	Viability of the No Action Alternative
D.	Justification of the No Action Alternative
5.	Programmatic Alternatives
A.	Programmatic Alternatives—general
B.	Development of Programmatic Alternatives
C.	Programmatic Proposed Action: Distributed Centers of Excellence
D.	Programmatic Alternative 2: Consolidated Nuclear Production Center
E.	Programmatic Alternative 3: Capability-Based
6.	Project-Specific Alternatives
A.	High Explosives R&D
B.	Tritium R&D
C.	NNSA Flight Test Operations
D.	Major Hydrodynamic Test Facilities
E.	Major Environmental Test Facilities
7.	Other Alternatives
A.	Other Alternatives—general
B.	Transportation of nuclear materials
C.	Disarmament, Dismantlement, Decommissioning alternatives
D.	Reduce stockpile alternatives
E.	Downsizing-in-place alternatives
F.	Responsible curatorship alternatives
G.	Alternatives that comply with NPT
H.	Comprehensive Test Ban Treaty alternatives

Table D.2-1—Comment Bin List (continued)

Topics and Subtopics	
I.	Security alternatives
J.	Safety alternatives
K.	Alternatives involving policy
L.	Test readiness alternatives
M.	Site alternatives
N.	Nonproliferation alternatives
O.	Cleanup alternatives
P.	New Triad
Q.	Alternatives promoting peace
R.	Future of the nuclear weapons complex
8.	Reliable Replacement Warhead
A.	RRW – general
B.	Opposition to RRW
C.	RRW and pit production
D.	RRW – analysis
E.	Relationship between RRW and Complex Transformation
F.	Question the need for RRW
9.	Cost and Schedule
A.	Cost-effectiveness of existing nuclear weapons complex
B.	Better use of resources
C.	Factors that could increase proposed costs
D.	Cost of cleanup
E.	Cost of each of the alternatives
F.	Cost-Benefit Study
G.	Timeline
10.	Candidate Sites
A.	Candidate sites – general
B.	LANL
C.	LLNL
D.	NTS
E.	TTR
F.	Pantex
G.	SNL/NM
H.	SRS
I.	Y-12
11.	Additional Analysis
A.	Additional analysis—general
B.	Nuclear weapons activities
C.	Special nuclear material
D.	Environmental analysis
12.	Kansas City Plant
A.	KCP – general
B.	Objection to the exclusion of KCP
C.	NEPA analysis for KCP
13.	Waste Isolation Pilot Plant
A.	WIPP – general
B.	WIPP as a candidate site
C.	Future of WIPP
D.	Support for WIPP as a candidate site
E.	Opposition to WIPP
14.	Sabotage and terrorism

Table D.2-1—Comment Bin List (continued)

Topics and Subtopics	
A.	Sabotage and terrorism-general
B.	Evaluation of sabotage and terrorism
C.	Suggested actions to protect against sabotage and terrorism
D.	LANL
E.	Pantex
F.	LLNL
15.	Resources
A.	Land Use
B.	Visual Resources
C.	Site Infrastructure
D.	Air Quality and Noise
E.	Water Resources
F.	Geology and Soils
G.	Biological Resources
H.	Cultural and Archaeological Resources
I.	Socioeconomics
J.	Environmental Justice
K.	Health and Safety
L.	Transportation
M.	Waste Management
N.	Facility Accidents
16.	General/Miscellaneous
A.	General support for Complex Transformation
B.	Support for the No Action Alternative
C.	Support for CNPC
D.	Support for the Capability-Based and Reduced Operations Alternative
E.	Support for siting at LANL
F.	Support for siting at LLNL
G.	Support for siting at NTS
H.	Support for siting at Pantex
I.	Support for siting at SRS
J.	Support for siting at Y-12
K.	Opposition to Complex Transformation
L.	Opposition to siting at LANL
M.	Opposition to siting at LLNL
N.	Opposition to siting at NTS
O.	Opposition to siting at SRS
P.	Opposition to siting at Pantex
Q.	Opposition to siting at SNL
R.	Opposition to siting at Y-12
S.	Divine Strake Environmental Assessment
T.	Other projects and sites
U.	Moral and ethical issues
V.	Proliferation and nonproliferation
W.	Criticism of the current administration and policy
X.	International relations/policy
Y.	Nuclear weapons
Z.	Nuclear power
AA.	War on Terror
BB.	IAEA Inspections in the U.S.[Consider renaming as IAEA Inspections in the U.S.]

Each comment document was read carefully. Scoping comments were identified and summarized. Each comment document was assigned a document number and was assigned to an appropriate issue category. Table D.2-2, provided at the end of this appendix, summarizes the comments received that fall within the scope of this SPEIS and also directs the reader to sections of this SPEIS that address these issues. In addition Table D.2-2 lists the comment documents which were assigned to that issue category.

Many comments were outside the scope of this SPEIS. These comments fell into the following general categories: 1) concerns about cost and schedule overruns; 2) moral/ethical issues; 3) the use of nuclear weapons; and 4) alternate uses of Federal funds. These comments are addressed, only to the extent they relate to the background discussion in Chapter 1: Introduction, and Chapter 2: Purpose and Need. Detailed design safety questions that are not covered in the Complex Transformation SPEIS would be covered in site-specific, tiered EISs.

D.3 SCOPING PROCESS RESULTS

More than 33,000 comment documents were received from individuals, interested groups, and Federal, state, and local officials during the public scoping period. In addition, approximately 350 individuals made oral comments during public meetings. Some commentators who spoke at the public meetings also prepared written statements. When the oral comments and written comments were identical, comments submitted by an individual commentator were counted once. Table D.3-1 provides a summary of the number of scoping comments received.

Table D.3-1—Scoping Documents Received

Document Type	Number Received
Individual Scoping Documents	1,207
Campaign 1	1,160
Campaign 2	6
Campaign 3	99
Campaign 4	115
Campaign 5	9
Campaign 6	38
Campaign 7	11,676
Campaign 8	381
Campaign 9	6
Campaign 10	138
Campaign 11	33
Campaign 12	17
Campaign 13	7
Campaign 14	21
Campaign 15	18,830
Campaign 16	3
Campaign 17	10
Campaign 18	6
Campaign 19	115
Campaign 20	15
Total Scoping Comment Documents Received	33,892

A comment is a distinct statement or question about a particular topic or a specific issue. Most of the oral and written public statements submitted during the EIS scoping period contained multiple comments on various issues.

A majority of the comment documents received were form letters or e-mail campaigns. A form letter is defined as a standard letter submitted by numerous individuals. An e-mail campaign has the same concept as a form letter, but is submitted via electronic mail. Twenty different form letters/e-mail campaigns were submitted during the scoping period. All contained comments similar to those summarized in Table D.2-2 except campaign letters 11 and 13, which addressed the regional socioeconomic benefits of the Y-12 National Security Complex in Tennessee and support for that site's mission. A majority of the form letters/e-mail campaigns received were from Campaigns 1, 7, and 15. Table D.3-2 provides a summary of these documents.

Table D.3-2—Summary of Campaigns 1, 7, and 15

Document	Summary
Campaign 1 (Postcard)	Commentors stated the proposed action to build more nuclear weapons is dangerous and unnecessary. Commentors also stated that the U.S. cannot produce nuclear weapons while insisting other countries not pursue nuclear capabilities; the U.S. should meet its obligations under the Non-Proliferation Treaty to pursue disarmament; and resources should be spent on cleaning pollution from past production.
Campaign 7 (E-mail campaign)	Commentors wrote to express opposition to the proposed Complex Transformation plan. Commentors stated that the nuclear weapons complex is unnecessary and expensive and that new studies conclude that nuclear warheads will last at least 100 years. Commentors endorsed the proposal's stated aim of downsizing the nuclear weapons infrastructure.
Campaign 15 (E-mail campaign)	Commentors stated that the EIS is too limited and should include an assessment of an alternative that would abandon plans to build nuclear weapons and make reductions in the nuclear stockpile. Commentors suggested that DOE prepare a nonproliferation impact assessment to determine how the proposals would affect the goal of stopping the spread of nuclear weapons.

In addition to the form letters/e-mail campaigns, NNSA received approximately 1,200 individual scoping documents. Scoping meeting transcripts from 17 meetings were also included in the comment analysis.

A summary of the major comments received during the scoping period and responses to these comments follows:

Comment: The majority of the comments expressed opposition to the nuclear weapons program and U.S. national security policies. Many of the comments stated that the U.S. is violating the Nuclear Non-proliferation Treaty (NPT). Many of the comments stated that NNSA should assess an additional alternative—disarmament in compliance with the NPT - and not design or build new nuclear weapons.

Response: The security policies of the U.S. require the maintenance of a safe, secure, and reliable nuclear weapons stockpile, and the maintenance of core competencies to design, manufacture, and maintain nuclear weapons. Article VI of the NPT obligates the parties “to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international

control.” Actions by the U.S., including its moratorium on nuclear testing accompanied by significant reductions in its strategic force structure, nuclear weapons stockpile, and production infrastructure, constitute significant progress toward these goals. However, unless and until there are significant changes in national security policy, NNSA is required to design, produce, and maintain the nuclear weapons stockpile pursuant to requirements established by the President and funded by Congress. In conjunction with the 2001 NPR, President Bush set an objective of “...achieving a credible nuclear deterrent with the lowest-possible number of nuclear warheads consistent with our national security needs....” In recognition of this objective and the reduction in the U.S. stockpile since the end of the Cold War, this SPEIS qualitatively evaluates changes in the alternatives that would be appropriate if the stockpile is reduced below the level called for by the Moscow Treaty. Accordingly, this SPEIS analyzes alternatives that satisfy requirements of the existing national security policy framework, as well as a capability-based alternative that, while not capable of meeting current requirements, could meet those requirements if the stockpile were reduced below the level called for by the Moscow Treaty.

Comment: Commentors stated that the reliable replacement warhead (RRW) was not needed and should not be pursued.

Response: RRW refers to possible future warhead designs that could replace existing “legacy” warheads. The RRW would not affect the proposed action of this SPEIS related to restructuring SNM facilities, or the proposed action to restructure R&D facilities. The proposed actions are independent of whether an RRW is developed. Because the environmental impacts analyzed are based on the maintenance of the legacy weapons that are currently in the stockpile, a conservative estimate of the environmental impacts is provided in this SPEIS. If RRW is approved as part of the national strategy for providing a nuclear deterrent, it would enable a shift to fewer hazardous operations. However, a production capacity for plutonium and highly-enriched uranium components, as well as for weapons assembly and disassembly, will be required for the foreseeable future with or without implementation of RRW. Chapter 2 provides a discussion of the RRW’s possible impact on the nuclear weapons stockpile and decisions about the Complex facilities.

Comment: Commentors stated that NNSA should develop a fair and objective statement for the purpose and need that takes into account the broader missions of NNSA that include preventing proliferation, ensuring the effectiveness of the NPT, and developing strategies to ensure the peaceful denuclearization of existing and threshold nuclear states, and the underlying legal obligations and treaty commitments.

Response: The fundamental principle underlying NNSA’s evaluation of alternatives is that the Stockpile Stewardship Program (SSP) must continue to support existing and reasonably foreseeable national security requirements. This is NNSA’s obligation and responsibility under the *Atomic Energy Act*² and the *National Nuclear Security*

² 42 U.S.C. 2011 *et seq.*

*Administration Act.*³ This SPEIS does not analyze alternatives to U.S. national security policy. Rather, it examines the environmental effects of proposed actions and reasonable alternatives for executing the SSP, which is based on requirements established by national security policy including the maintenance of a safe, secure, and reliable nuclear weapons stockpile, and the maintenance of core competencies to design, manufacture, and maintain nuclear weapons. NNSA continues work in other areas, including those identified in comments. Nuclear weapons knowledge has and will continue to enable nonproliferation; however, they are not dealt with in this SPEIS.

Comment: Commentors asked why NNSA was not assessing a consolidated nuclear production center (one site for plutonium, enriched uranium, and weapons assembly/disassembly) as a reasonable alternative for transforming the Complex.

Response: A consolidated nuclear production center (CNPC) alternative was added as a reasonable alternative and is discussed in Section 3.5 of this SPEIS. NNSA decided to analyze this alternative in order to assess the potential impacts of consolidating major nuclear weapons and SNM production missions at one site.

Comment: Commentors stated that pits will last up to 100 years and potentially longer; therefore, there is no need for new pit production capacity.

Response: This SPEIS addresses the environmental effects of both possessing and utilizing a pit production capacity in the event decisions are made to produce pits. While the current state of knowledge is that there may not be a need to produce pits in the near future because of the plutonium's longevity, NNSA cannot be certain that other issues associated with pits, other than the aging of plutonium materials, would never arise. Accordingly, prudent management requires that NNSA maintain a capacity to produce pits as long as this nation maintains its nuclear stockpile. A small pit fabrication capability is currently being maintained at LANL and is part of the No Action Alternative evaluated in this SPEIS.

Comment: Commentors asked why KCP was not being considered in this SPEIS, and stated that NNSA was not representing the full cost of Complex Transformation by excluding alternatives involving activities currently performed by KCP.

Response: Following the Non-nuclear Consolidation Environmental Assessment (DOE 1993), NNSA decided to consolidate most non-nuclear operations to improve efficiency. In the SSM PEIS (DOE 1996d), NNSA further considered alternatives with respect to non-nuclear operations, including relocating those capabilities to the NNSA national laboratories. The decision was made (61 FR 68014; December 26, 1996) to retain the existing facilities at the KCP. This was the environmentally preferable alternative, posed the least technical risk, and was the lowest cost alternative.

³ Title 32, *National Defense Authorization Act for Fiscal Year 2000*, Public Law 106-65

Because the non-nuclear operations at KCP are essential and do not duplicate the work at other sites, no proposal for combination or elimination of these missions was formulated. A recent analysis has concluded that transferring these KCP non-nuclear operations to a site other than one within the immediate Kansas City area would not be cost effective (SAIC 2008). Consequently, the non-nuclear operations would remain at either the current KCP or a new facility in the Kansas City area, and would neither affect nor be affected by the decisions regarding the alternatives in this SPEIS.

Comment: Commentors requested an analysis of the risks and impacts of terrorist attacks on NNSA facilities.

Response: With respect to intentional destructive acts, substantive details of attack scenarios and security countermeasures are not released to the public because disclosure of this information could be exploited by terrorists to plan attacks. Depending on the malevolent, terrorist, or intentional destructive acts, impacts may be similar to or would exceed accident impact analyses prepared for the SPEIS. A separate classified appendix to this Draft SPEIS has been prepared that evaluates the underlying facility threat assumptions with regard to malevolent, terrorist, or intentional destructive acts. The methodology for the analysis in this classified appendix is discussed in Appendix B. These data provide NNSA with information upon which to base, in part, decisions supported by this SPEIS.

Comment: Support for the continuation of the NNSA flight test mission at the Tonopah Test Range was received from the Tonopah community. Commentors demanded evidence of a compelling reason to move this mission from Tonopah.

Response: A detailed impact analysis was prepared for the NNSA flight testing alternatives and is presented in Section 5.15.4.2 of the SPEIS. The analysis discusses the potential socioeconomic impacts to the Tonopah community of NNSA flight testing alternatives.

Comment: Commentors expressed opposition to any new nuclear facilities. There was specific opposition to expanding pit production at LANL, as well as the proposed consolidated plutonium center (CPC). Commentors stated that the LANL Site-Wide EIS should follow the Complex Transformation SPEIS.

Response: NNSA added analysis of an alternative that would upgrade facilities at LANL for a smaller pit production capacity (up to 80 pits per year) than the baseline capacity (125 pits per year, single shift) of the proposed CPC (see Section 3.4.1.2). NNSA is evaluating increasing its current capacity to produce nominally 20 pits per year at LANL in a site-wide EIS (LANL 2006a). It is expected that a final LANL Site-wide EIS will be issued prior to completion of this SPEIS.

Comment: Commentors stated that a site near the Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico, should be considered as a reasonable location for a CPC.

Response: In order to determine the reasonable site alternatives for a CPC, all existing, major DOE sites were initially considered as a potential host location for a CPC. Sites that do not maintain Category I/II SNM were eliminated from consideration, as were sites that did not conduct major NNSA program activities. WIPP did not meet these siting criteria. Other DOE sites were not considered reasonable locations because they do not satisfy certain criteria such as population encroachment, mission compatibility, or synergy with the site's existing mission. Following this process, NNSA decided that Los Alamos, NTS, Pantex, SRS, and Y-12 constitute the range of reasonable site alternatives for a CPC.

As a result of the scoping process, NNSA made the following significant changes to the scope of the Complex Transformation SPEIS:

- A consolidated centers of excellence (CCE) alternative was added as a reasonable alternative (see Section 3.5). NNSA would consolidate plutonium, uranium, and weapon assembly/disassembly functions into a CNPC at one site or into Consolidated Nuclear Centers (CNCs) at two sites.
- A discussion was added of effects on the Complex of an even smaller nuclear weapons stockpile than the current level envisioned under the Moscow Treaty (see Section 5.11).
- A discussion was added of the RRW's possible impact on the nuclear weapons stockpile and decisions about Complex Transformation. An analysis was added to determine what, if any, changes to the Complex would be required if the RRW were to be developed (see Chapter 2).
- A more detailed analysis of the potential impacts of NNSA flight testing was added in order to inform the public and NNSA of the potential socioeconomic impacts to the Tonopah community from the alternatives (see Section 5.15.4.2).
- An analysis of a smaller pit production facility (50 to 80 pits per year) was added (see Section 3.4.1.2).
- A more detailed explanation of why the Kansas City Plant non-nuclear operations are not included in this SPEIS was added (see Section 3.2.10).

Table D.2-2—Summary of Scoping Comments

Topic 1. Policy

Subtopic	Comment Summary	Documents	SPEIS Reference
Existing Treaties—General	<p>Commentors believe that the current nuclear 'deterrence' policy has failed and has placed the world on the brink of nuclear winter.</p> <p>Enduring and legally binding U.S. Treaty Obligations must inform the domain of reasonable alternatives for analysis. As part of the supreme law of the land, U.S. treaty obligations are far more dispositive than the strategic ramblings of now discredited and departed senior Pentagon bureaucrats.</p> <p>As one of his first official acts, after taking office in January 1977, President Jimmy Carter asked the Secretary of Defense for an analysis of the implications of mutual U.S. and Soviet reductions in the number of strategic nuclear delivery vehicles to 200–250. If the President of the U.S. could find such a greatly reduced nuclear force to be sufficiently reasonable, at the height of the Cold War, to merit commissioning a Pentagon study of it, surely it is objectively reasonable for NNSA today—16 years after the dissolution of the Soviet empire that prompted deployment of U.S. nuclear weapons in such vast quantities—to analyze the implications of comparable and even smaller nuclear forces for the future configuration of the U.S. nuclear weapons complex.</p> <p>Commentors state that DOE should consider the 1996 World Court decision that nuclear weapons are illegal; the proposed action therefore violates this determination and is unlawful.</p>	2, 6, 104, 138, 196, 263, 348, 1209, 1220	Chapter 2
Presidential Directives, Public Law, and Current Policies	<p>Commentors state that DOE should take into consideration an adverse change in the American political climate as part of the global political climate due to expanding U.S. nuclear arsenal and wait until the next administration to continue with the project. DOE should adopt new policies that will favor disarmament and a 'no-first-use' policy.</p> <p>Commentors expressed concern that the U.S. has halted progress in the development of the Fissile Material Cutoff Treaty (FMCT) and that the artificial enrichment with plutonium or uranium will violate</p>	Campaign 18, 4, 67, 104, 111, 263, 281, 511, 320, 378, 516, 781, 1218, 947, 1152, 1190	Chapter 2, Chapter 3, Section 2.1.4, Chapter 5, Section 10.4

Table D.2-2—Summary of Scoping Comments (continued)

Topic 1. Policy

Subtopic	Comment Summary	Documents	SPEIS Reference
	the current fissile material ban being negotiated by the Conference on Disarmament. Commentors also support a fissile materials treaty to prevent the creation and transportation of HEU and plutonium.		
Nuclear Posture Review	The December 2001 Nuclear Posture Review is not a sufficient basis for the purpose and need for agency action. It does not comprise an act of law or even a formal policy directive, and in no way establishes or constrains the domain of future stockpile requirements that may be considered reasonable. The theory advanced in the NPR that a weapons stockpile provides deterrent value is flawed and undermines nonproliferation work.	2, 6, 1048, 1090, 1220	Sections 2.1, 2.1.2
Comprehensive Test Ban Treaty	Commentors stated that the Complex Transformation plan goes against the NPT and would result in the end of the Comprehensive Test Ban Treaty. Complex Transformation is a step toward rejecting ratification of CTBT and is preventing ratification; ratification of the CTBT should be considered.	104, 263, 333, 335, 1137, 1220, 263, 690, 1210, 4	Section 2.1.3
Treaty on the Non-Proliferation of Nuclear Weapons	Commentors stated that the NOI is false in stating that the number of weapons to be produced would be consistent with international arms-control agreements. They are not consistent with the NPT. Commentors stated that accelerating nuclear weapons manufacture is a violation of the NPT as well as Article IV of the Constitution, and will further the global proliferation of nuclear weapons. Commentors believe the U.S. should be complying with NPT and denuclearizing our arsenal. Commentors suggested that the SPEIS should discuss existing treaty limitation concerning proliferation of nuclear material/weapons (including U.S. efforts to limit proliferation) and analyze how the proposed action will/will not jeopardize existing international agreements. Commentors stated that the U.S. should commit to the elimination of nuclear weapons no later than Transformation.	Campaign 4, Campaign 5, Campaign 6, Campaign 7, Campaign 10, Campaign, 12, Campaign 14, Campaign 15, Campaign 17, Campaign 18, 1, 2, 3, 4, 5, 6, 7, 9, 10, 18, 20, 22, 23, 24, 30, 31, 37, 57, 59, 60, 63, 65, 67, 71, 75, 80, 81, 83, 85, 87, 88, 91, 92, 94, 96, 102, 103, 104, 105, 107, 110, 111, 113, 126, 128, 132, 133, 134, 138, 141, 145, 152, 153, 164, 190, 196, 199, 204, 207, 208, 210, 234, 216, 217, 220, 260, 263, 281, 285, 286, 300, 303, 316, 318, 319, 320, 324, 326, 330, 333, 335, 338, 339, 343, 348, 355, 358, 360, 361, 363, 367, 371, 373, 378, 379, 380, 391, 394, 396, 399, 401, 402, 403, 404, 405, 406, 408, 410, 411, 413, 414, 418, 423, 424, 425, 427, 428, 430, 437, 438, 434, 439, 444, 446, 454, 458, 464, 472, 476, 479, 488, 492, 497, 510, 524, 529, 530, 540, 536, 544,	Chapter 2, Sections 2.1.3, 2.1.4, 2.1.5, 2.1.6

Table D.2-2—Summary of Scoping Comments (continued)

Topic 1. Policy

Subtopic	Comment Summary	Documents	SPEIS Reference
		550, 560, 585, 586, 587, 589, 571, 577, 596, 595, 597, 603, 607, 608, 615, 618, 619, 621, 626, 627, 634, 635, 636, 644, 649, 660, 674, 675, 686, 689, 695, 696, 697, 701, 716, 719, 721, 716, 723, 725, 732, 734, 737, 740, 741, 747, 749, 751, 753, 758, 760, 761, 762, 764, 765, 767, 769, 780, 843, 850, 860, 854, 872, 876, 878, 906, 898, 899, 902, 1087, 1099, 1188, 1123, 1126, 1128, 1143, 1208, 1209, 1210, 1217, 1218, 1219, 1222, 1223	
Moscow Treaty	Commentors stated that DOE must comply with Moscow Treaty. The Strategic Offensive Reductions Treaty commits us to the reduction of our strategic nuclear arsenal from the estimated 5,000 to at least 2,200 in the next six years. In this case it seems the Moscow Treaty is a flawed treaty that provides a minimal benefit that is insufficient to mitigate the negative implications of the proposed action.	Campaign 18, 145, 164, 263, 516, 898, 769, 943, 1004, 1181, 1190, 1211, 1212	Section 2.1.5
International Policies	Commentors criticized that the U.S. is legally obligated to adhere to the requirements of customary international law, such as START I and II, and is violating international law and treaties and should support a fissile materials treaty to prevent creation and transport of HEU and plutonium.	4, 426, 445, 138, 752, 524, 883, 904, 837, 823, 1101, 1009, 1059, 1043, 1046, 1047, 1050, 1178, 1190, 1194, 1153, 1208, 1211, 1212, 1219, 1210, 1215, 1222, 1223, 263, 313, 320, 383, 450, 482	Sections 2.1.2, 2.1.3, 2.1.4, 2.1.5; the proposed action would not violate any existing international law.
Nuclear Waste Policy Act	Transformation contradicts intent of NWPA and project operations must be in compliance to protect public health.		Section 10.3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 2. NEPA Process

Subtopic	Comment Summary	Documents	SPEIS Reference
General NEPA Process	Commentor expressed opinion regarding the limitation of the NEPA process. Another commentor suggested that NNSA give a basic introduction of what is planned for people who are not technically proficient in the NEPA process.	6, 1219	Section 1.5, 1.6
Whether To Prepare a New PEIS Versus a Supplemental PEIS	<p>Commentor stated that supplementing the aging and flawed SSM-PEIS of 1996 may not be the best strategy for NEPA review of “complex transformation.” The original SSM-PEIS was very far from comprehensive in its coverage: non-nuclear component manufacturing ,tritium production and recycling, and weapons-usable fissile material storage and disposition, all activities intrinsic to the operations of the U.S. nuclear weapons complex were segmented from the original proposal for a comprehensive post-cold war “Reconfiguration PEIS” and subsequently analyzed in separate NEPA documents supporting a series of staggered and haphazard restructuring decisions throughout the decade of the 1990’s.</p> <p>Commentor stated that the SSM PEIS focused by default on a narrow range of remaining “decisions” about the “reconfigured” complex, some of which had already in effect been made years earlier while others turned out to be far less consequential than originally advertised by NNSA’s predecessor DOE Defense Programs.</p> <p>The NOI is rife with evidence of rampant illegal segmentation of NEPA analysis in a manner that obstructs formulation of reasonable programmatic alternatives and analysis of cumulative and connected impacts.</p> <p>Commentors also stated that since the previous PEIS, Complex programs will have changed. A new PEIS is required, covering all aspects of the plan to develop 'replacement' nuclear weapons and facilities to provide opportunity of a review of the whole system.</p> <p>Commentors also suggested that tailoring the inclusion or exclusion of major and very costly proposed projects to suit the parochial interests of particular sites, or the immediate programmatic goals of NNSA as currently defined, defeats the purpose of a NEPA</p>	2, 4, 5, 9, 716, 1218	Chapter 1, Sections 1.5, 1.6, 2.0, 2.1, 2.5, Chapter 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 2. NEPA Process

Subtopic	Comment Summary	Documents	SPEIS Reference
	programmatic analysis, by creating “facts on the ground” that arbitrarily foreclose consideration of reasonable consolidation and location alternatives.		
Stakeholder Involvement	<p>Commentors stated that DOE involve all stakeholders in the decision-making process including the Western Shoshone people in the central decision-making process, and request that International Atomic Agency (IAEA) and other international law experts formally submit comments to this proposed action.</p> <p>Commentors suggest polling long-time residents of Nevada concerning safe storage of radioactive waste in Nevada.</p> <p>One commentor stated that tables should be set up for the display of NGO literature and be in a prominent location where people can easily access provided information.</p> <p>Commentors also suggested that DOE speak with the communities, including Native American Tribes, surrounding the proposed sites and along transportation corridors regarding their current traditional and foreseeable future use of land and resources.</p>	215, 263, 763, 1208, 1223, 1179	<p>Section 1.6, Chapter 2</p> <p>Tables were provided to NGOs at scoping meetings.</p> <p>DOE conducts public meetings allowing the public to participate in the decision-making process.</p>
Scoping Process— Notification	Commentors stated that the public comment period is only publicized and convenient to those who are educated. Public hearing notices should be published 45 days before the first hearing and should appear in the appropriate newspapers the Sunday before the hearings and also on the day before each hearing.	9, 1179, 1209	Section 1.6
Length of Scoping Period— Number and Location of Scoping Meetings	<p>Commentors requested that the public comment period be extended from 60 days to 180 days and additional meetings be added. Commentors suggested that future hearings and meetings be properly and widely advertised and held in locations that are easily accessible to the public (i.e., via public transportation and all through the day and night to accommodate various work schedules). Commentor suggested discussing the logistics of meetings with community members in advance.</p> <p>Specific comments on locations of public meetings included changing the venue for the Los Alamos meetings, meetings should also be held in Espanola and Pojoaque, NM; additional public</p>	Campaign 19, 4, 5, 9, 47, 53, 191, 207, 215, 296, 315, 325, 500, 745, 763, 1048, 1044, 1048, 1050, 1083, 1216, 1218, 1125, 1134, 1179, 1209	Section 1.6

Table D.2-2—Summary of Scoping Comments (continued)

Topic 2. NEPA Process

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>hearings for SRS should be held at the state capital, additional meetings should also be held in Nevada, Utah, eastern California, Salt Lake City/St. George, near Livermore, and near Kansas City. Meetings should also be held at major population centers such as San Diego, CA; Phoenix, AZ; New York City, NY, Boise, ID; Las Vegas, NV, etc. In addition, meetings should also be conducted in areas downwind, down gradient, and along shipping routes</p> <p>One commentor had specific concerns about how the first public hearings were held in Clark County, as opposed to the actual proposed site of Tonopah.</p>		
<p>Scoping Meeting Format, Scoping Meeting Fact Sheets</p>	<p>Commentors suggested that a combination of an "open house" with roundtable discussions to allow for the possibility of real negotiations and questions/answers from both sides and a facilitated hearing is the best way to maximize the solicitation of scoping comments and inform the public of the proposed action with longer time for the public to speak. Some commentors stated that the poster session was insufficient. Commentors also suggested the use of a court reporter at hearings.</p> <p>Another commentor had a specific comment regarding an incomplete sentence on a fact sheet handed out during the scoping meetings and requested that the sentence be completed.</p> <p>Commentor questioned when the public would be able to sign up to speak.</p> <p>Commentor requested that detail on special security requirements be provided to the public and public leaders.</p> <p>Commentor requested that daycare be provided during scoping meetings.</p> <p>Commentor asked why RRWs are not on any other fact sheets other than the fact sheet entitled "Getting the Job Done."</p> <p>Commentor suggested being consistent with the use of "security" on</p>	<p>4, 5, 9, 167, 215, 303, 641, 763, 1048, 1050, 1146, 1212, 1213, 1217</p>	<p>Sections 1.6, 2.5</p>

Table D.2-2—Summary of Scoping Comments (continued)

Topic 2. NEPA Process

Subtopic	Comment Summary	Documents	SPEIS Reference
	fact sheets.		
Scoping Comments	<p>Commentor suggested that DOE provide the opportunity to comment both in private and in public and that DOE report how many Complex Transformation scoping comments state that the proposed Transformation will result in proliferation, a decrease in proliferation, or will have no effect.</p> <p>Other commentors requested an explanation of the impacts the scoping comments from the public would have.</p>	4, 5, 146	Section 1.6
Availability of Information	<p>Commentors stated that insufficient information is provided to the public and that NNSA seems to be prejudicing the outcome of Complex Transformation by not providing handouts for all scenarios proposed.</p> <p>Commentors requested that DOE release secure documents and all previous tiered NEPA documents available on the project Web site and make all reference documents for the SPEIS available on the internet and on CD format.</p> <p>Commentors also stated that DOE should provide a complete listing and presentation of all documents upon which it intends to rely for the Complex Transformation along with all references, and related site-specific EAs and EISs.</p>	Campaign 19, 4, 5, 6, 9, 48, 263, 1209, 1218, 1225	<p>Chapter 2, 12</p> <p>The Administrative Record will be available to the public. NNSA has made every effort to provide the reader with sufficient information to satisfy NEPA requirements. Release of sensitive information is an issue of law and national security.</p>
NEPA Compliance	<p>Commentors believe that the project is not compliant with NEPA and its implementing regulations and it is speculated that DOE is intentionally circumventing meaningful NEPA compliance.</p> <p>Comments submitted regarding compliance with NEPA included concern about the chronological release of the LANL SWEIS and Complex Transformation process. The LANL SWEIS NEPA process should follow (not precede) the Complex Transformation NEPA process as the outcome of the LANL SWEIS may substantially determine NNSA's pit production strategy. In addition, the commentor objected to the declared intention to press ahead with an EIS and ROD covering modernization of Y-12 capabilities</p>	2, 4, 6, 18	Chapter 1, Sections 1.5.2, 1.5.4.2

Table D.2-2—Summary of Scoping Comments (continued)

Topic 2. NEPA Process

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>even as the Complex Transformation SPEIS gets underway. Under at least some reasonable scenarios for deep reduction in the nuclear stockpile, it would make economic, security, and logistical sense to consolidate a portion or all of these activities at LANL, or at some other site or sites closer to the geographic center of a future complex in the southwestern triangle formed by Pantex, SNL, and LANL.</p> <p>Commentors objected to the arbitrary and counter-productive exclusion of options for consolidating uranium, secondary, and case fabrication activities currently performed at Y-12 in Oak Ridge, TN.</p> <p>Commentors stated that the CMRR decision appears to prejudice both the current LANL SWEIS and Complex Transformation.</p>		
NEPA Conflict-of-Interest	Commentors suggested that DOE has a conflict-of-interest with projects at LANL that would prejudice the present SPEIS decision-making process.	6	Section 1.5.4.2

Table D.2-2—Summary of Scoping Comments (continued)

Topic 3. Programmatic Purpose and Need

Subtopic	Comment Summary	Documents	SPEIS Reference
Purpose and Need—General	<p>Commentors suggested that the SPEIS develop a fair and objective statement of the “Purpose and Need for the Proposed Action” that is based on more than the 2001 NPR. The purpose and need must also consider the NPT and International Court of Justice in the Hague opinion. The purpose and need should take into account the broader missions of the NNSA that include preventing proliferation, ensuring the effectiveness of NPT and developing strategies for ensuring the peaceful denuclearization of existing and threshold nuclear states and the legal obligations and treaty commitments that underpin them. The purpose and need must clearly state and include the full ramifications of the proposed project and how it will better secure the health and safety of the American people.</p> <p>Commentors also stated that the construction of the CPC is unjustified and questioned the purpose of the 125 certified pits. Commentor suggested that JASON’s review data should be considered and be included in the purpose and need.</p> <p>Commentors also suggested that the purpose and need should clarify the meaning of “modernization activities, changing character”, and developing a “responsive infrastructure.”</p>	2, 4, 9, 190, 215, 263, 323, 491, 690, 715, 769, 781, 1048, 1149, 1162, 1218, 1225	<p>Section 1.4 Chapter 2, Sections 2.1, 2.1.4, 2.1.5, 2.1.7, 2.2.2, 2.3.3, 2.3.4, 2.5.6, 3.1, 3.3.1, 3.4.1</p> <p>As NNSA dismantles more retired nuclear weapons, the number of pits in storage does increase.</p>
Relationship to Stockpile Stewardship and Management	<p>Commentors questioned why we are presently renewing our nuclear weapons under the Stockpile Stewardship Program, making our warheads last over 100 years. Has the 'no new plutonium sites' policy in the 1996 Final SSM PEIS changed?</p> <p>Commentors also questioned if any of the sites (Pantex, NTS, and Y-12) considered by the 1996 SSM PEIS were found NOT to be reasonable candidates for plutonium handling missions and had become plutonium sites since 1996?</p>	73, 92, 105, 111, 1220	<p>Chapter 2, Section 2.2.2</p> <p>NNSA is not proposing to create a new nuclear site in this SPEIS.</p> <p>This SPEIS has only proposed alternatives.</p>
Question the Need for Complex Transformation	Commentors questioned the need for Complex Transformation when a nuclear weapons arsenal already exists and weapons that have been NNSA certified are available. Commentors stated that the SPEIS needs to explore the need for the proposed action and how it will better secure health and safety of the American people.	Campaign 1, Campaign 2, Campaign 5, Campaign 7, Campaign 8, Campaign 9, Campaign 10, Campaign 14, Campaign 16, Campaign 17,	Chapter 2, Sections 2.1, 2.1.4, 2.1.5, 2.1.6, 2.1.7, 2.2.2, 2.3.1, 2.3.2, 2.3.3.2, 2.3.3, 2.4, 3.3.1

Table D.2-2—Summary of Scoping Comments (continued)

Topic 3. Programmatic Purpose and Need

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>Commentors stated that building up our nuclear capabilities makes no sense when our biggest threat is from non-state terrorist groups and the proliferation of weapons to other states. The U.S. cannot produce nuclear weapons while insisting other countries not pursue nuclear capabilities</p> <p>Numerous commentors stated that DOE must prove that the plutonium pit-aging phenomenon is occurring and problematic and explain why there is a need to expand pit production over existing capabilities when the number of pits is already oversized and unneeded.</p> <p>Commentors stated that consolidation and downsizing of the complex is not dependent on Complex Transformation and questioned how having a responsive infrastructure will help strengthen the global nonproliferation regime.</p> <p>Commentors stated that the U.S. should proceed with nuclear disarmament because there is no need to be armed with nuclear weapons.</p>	<p>Campaign 12, Campaign 18, 1, 2, 4, 5, 6, 10, 22, 31, 32, 48, 57, 66, 67, 68, 75, 76, 80, 96, 97, 99, 104, 107, 108, 110, 111, 128, 145, 146, 149, 153, 191, 193, 204, 207, 209, 211, 215, 263, 265, 266, 268, 272, 275, 277, 320, 323, 326, 327, 328, 330, 331, 333, 336, 340, 342, 343, 348, 354, 355, 359, 361, 368, 369, 380, 390, 391, 392, 402, 403, 406, 411, 413, 422, 423, 427, 428, 430, 431, 437, 440, 441, 443, 444, 445, 450, 491, 529, 535, 538, 540, 541, 548, 550, 552, 567, 571, 586, 587, 588, 589, 591, 593, 634, 652, 682, 684, 686, 687, 690, 693, 695, 697, 700, 723, 725, 743, 763, 765, 769, 770, 771, 781, 787, 798, 800, 801, 807, 810, 827, 820, 822, 828, 843, 845, 859, 861, 889, 907, 953, 962, 965, 972, 973, 974, 976, 1045, 1048, 1054, 1056, 1087, 1095, 1097, 1099, 1100, 1103, 1107, 1111, 1112, 1113, 1123, 1132, 1137, 1138, 1142, 1143, 1153, 1155, 1181, 1188, 1190, 1191, 1200, 1205, 1206, 1208, 1209, 1210, 1213, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1220, 1222, 1223, 1224</p>	

Table D.2-2—Summary of Scoping Comments (continued)

Topic 4. Programmatic No Action Alternative

Subtopic	Comment Summary	Documents	SPEIS Reference
No Action Alternative— General	Commentors suggested including an 'amended' no action alternative which aims to not expand the nuclear pit fabrication capacity of the U.S.	Campaign 5, Campaign 9, 52, 686, 693, 894, 1218, 1223	Section 3.3.1, 3.4.1.6
No Action Alternative Needs To Be a True No Action	Commentor stated that the “No Action” Alternative must be genuine. We object to the current NOI’s definition of “No Action” Alternative which actually incorporates a host of activities and proposed actions that a direct bearing on the future structure of the weapons complex under review. We strongly urge that analysis of major new projects covered by the ongoing Y-12 and LANL Site Wide EIS’s be placed on hold and made subordinate to the analysis and outcomes of the SPEIS process. To do otherwise would severely compromise the integrity and utility of the SPEIS, which would then be compelled to wrap itself around site-specific decisions and projects that will effectively predetermine and artificially constrain the consideration of programmatic alternatives for the complex as a whole.	2	Chapter 3
Viability of the No Action Alternative	This SPEIS must present a credible analysis of the No Action Alternative including the "viability" of the No Action Alternative for meeting existing pit production requirements necessary to satisfy requirements of stockpile stewardship inventories.	47, 904, 910, 937, 1057, 1213, 1216	Section 3.4.1.6
Justification of the No Action Alternative	Commentors requested a description of how the reduced operations and no action alternatives differ to require analyses in a complex-wide SPEIS as neither includes construction of a CPC, consolidation of SNM and elimination of duplicate facilities, flight testing, reduction of production capacities at Pantex, Y-12, and SRS, and dismantlement activities. In addition, DOE must provide legal justification for choosing or not choosing the No Action Alternative in the Draft SPEIS.	5, 1218	Section 3.1, 3.3, 3.6, Chapter 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 5. Programmatic Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
Programmatic Alternatives— General	<p>The current proposal only has three options and is too limited; there should be more alternatives. The alternatives presented in the NOI are also unresponsive to key members of Congress and to the NPT.</p> <p>Commentors also stated that any alternative that contemplates developing weapons of mass destruction poses an unacceptable risk to the environment, country, species and the planet. Proposed alternatives threaten human health.</p> <p>Commentors also suggested that each alternative include an analysis of the potential for a new international arms race and the local, regional, and international impacts; how nuclear weapons increase global security; how proposed action will impact specifically Middle Eastern peace and security; who will benefit from a reciprocal reaction from other states; who will be impacted internationally, as well as locally, regionally, and nationally by proposed activity; who will benefit from the proposed alternatives; and the environmental and human health impacts both nationally and internationally from the arms race that would be instigated by a reciprocal action from other states.</p>	Campaign 15, Campaign 17, 6, 555, 1216, 1135, 1153, 1154, 1210, 1217, 1218, 1223	Chapters 3, 5, Sections 2.1.4, 2.4 3.1, Sections 5.x.11 for all sites
Development of Programmatic Alternatives	<p>Commentors questioned the development of the alternatives and stated that transformation is not a consolidation plan, it is a revitalization plan. It goes from 8 sites to 8 sites. Consider a real consolidation plan.</p> <p>Commentors expressed the concern that the nuclear weapons produced by Complex Transformation will be used in the future with negative consequences.</p> <p>One commentor stated that all major nuclear weapons sites are to be retained in NNSA's plan, an assumption which the House Appropriations Committee and the Secretary of Energy's SEAB have opposed. NNSA offers only two alternatives: (1) a somewhat reduced level of manufacturing expansion accompanied (by) some consolidation within sites and elimination of unspecified duplicate facilities; and (2) implementation of plans in place today, involving</p>	6, 9, 104, 747, 1208, 1209, 1217, 1219, 1220, 1222, 1223	Chapter 3, Section 3.5, Appendix C

Table D.2-2—Summary of Scoping Comments (continued)

Topic 5. Programmatic Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>manufacturing expansion as well. The same commentor also stated that NNSA's plans to build thousands of new warheads in the RRW program over the next quarter century, which have not been endorsed by the DoD or approved by Congress, while at the same time maintaining and extending the working life of existing warheads until the new RRWs could take their place, appears to underlie the choice of alternatives in the Complex Transformation Plan. It should be unnecessary to remind NNSA that alternatives proposed by DOE's own SEAB is a reasonable alternative. The same commentor also stated that the NEPA history of radiographic hydrotesting is an object lesson in what must be avoided this time around. The Supplemental PEIS must include a comprehensive and detailed presentation of the full suite of presently planned and "reasonably foreseeable" hydrotesting capabilities, and "reasonable" alternatives thereto, over the full time period covered by the analysis.</p> <p>The set of "reasonable alternatives" for analysis for this and indeed all aspects of the SPEIS, is bounded not by what the proposing agency itself "desires" or "prefers" but by what an objective informed observer would regard as economically, technically, and environmentally reasonable in light of a reasonably foreseeable range of future nuclear weapons requirements. These alternatives in turn must be bounded by a "decent respect for the opinions of mankind."</p> <p>Even in the case of possibly legitimate fears of impending WMD attack, U.S. first use of nuclear weapons in a "preemptive strike" would likely result in a disproportionate, overwhelming, and indiscriminate use of military force in violation of international humanitarian law. We therefore find it entirely reasonable to insist that the range of reasonable alternatives for the 2030 nuclear weapons complex must embrace options that not only include very deep nuclear stockpile reductions, but also exclude NNSA complex support for weapons and capabilities required to implement illegal preemptive and preventive nuclear attacks.</p>		

Table D.2-2—Summary of Scoping Comments (continued)

Topic 5. Programmatic Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>Commentors also stated that national security is enhanced by this project through consolidation at one site.</p> <p>NNSA fails to name or consider any alternative which realistically treats environmental, economic, and geopolitical realities which the average citizen can recognize as being of great importance.</p> <p>All the alternatives fall short of a feasible long-term sustainable plan for facilitating the health and safety of U.S. citizens.</p>		
Programmatic Proposed Action: Distributed Centers of Excellence	<p>Commentors stated that this alternative directly contradicts the NPT obligation and needs to be proven that the CPC is necessary in light of our obligation to comply with the NPT to reduce the nuclear arsenal. Commentors suggested that this alternative be eliminated.</p> <p>Numerous commentors made suggestions regarding the analysis of this alternative. These include: discussion of the facilities and industrial processes that are involved with the CPC; define baseline capacity; question if the CPC is a design-build project and why; explain the rationale for the order of the baseline CPC schedule and why the need to approve the mission in 2008, will the decision be made before the ROD, questions whether this decision is prejudice, and will the decision to proceed with the CPC be made in the ROD?; what will the site decision be based on?; when analyzing CPC include analysis on environmental justice, environmental safety threats, and regional cumulative impacts; and requested that decisions on the replacement UPF be deferred pending evaluation of the consolidated complex.</p> <p>Commentors also expressed specific questions regarding the CPC:</p> <ul style="list-style-type: none"> • How will the CPC enhance deterrence when resumed industrial-scale nuclear weapons production could encourage other countries to follow the U.S.'s lead? • What is the ratio of pits produced to certified pits expected to be for the CPC? Is the ratio expected to be different for different 	Campaign 5, 4, 5, 330, 792	Chapters 2, 5, 6, 13, Sections 1.5, 1.5.3, 3.1, 3.4, 3.16

Table D.2-2—Summary of Scoping Comments (continued)

Topic 5. Programmatic Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>pits? How is this ratio estimated? Does a baseline capacity mean 125 pits produced or certified pits?</p> <ul style="list-style-type: none"> At which site will the CPC cause the most environmental impacts and need the most mitigation measures? 		
Programmatic Alternative 2: Consolidated Nuclear Production Center	Commentor stated that in light of its lower security overhead and environmental advantages the CNPC proposal is objectively reasonable and must be analyzed for a range of stockpile sizes including very low levels of nuclear forces.	2	Section 3.5
Programmatic Alternative 3: Capability-Based	<p>Commentors stated that a drawback of Alternative 3 is that the production capacity would not be sufficient to meet current national security objectives. Commentors requested the specific definition of “nominal level” as well as the justification for this determination.</p> <p>Another commentor suggested the elimination of plutonium production and surveillance and research and development for this alternative.</p> <p>Commentor is concerned that under this alternative the removal of Category I/II SNM from LANL would have instant ramifications on the site and result in the cancellation of more than a billion dollars in new construction projects listed and analyzed in the LANL SWEIS.</p>	5, 6, 1210, 1215	Sections 2.3.3.2, 3.4.1.4, 3.5, 3.6

Table D.2-2—Summary of Scoping Comments (continued)

Topic 6. Project-Specific Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
High Explosives R&D	<p>Commentors were concerned about the effects this alternative would have on the environment and requested that environmental, socioeconomic, demolition and transportation impacts at all sites be evaluated and provide a baseline for each of these resources.</p> <p>Commentor expressed concern that DOE has predetermined that HE production, pressing, and machining will be located at Pantex.</p> <p>Commentors had specific questions regarding HE R&D:</p> <ul style="list-style-type: none"> • How many HE R&D experiments are conducted annually and will any alternatives reduce the number of HE R&D experiments? • Will downsizing of HE R&D require new buildings? 	4, 104, 1219	Sections 3.2.5, 3.8, 3.15, 5.10, 5.17, Chapter 5
Tritium R&D	<p>Commentors requested the necessity of this alternative especially if the production of nuclear weapons is abandoned. Commentors were also concerned about effects this alternative would have on the environment and requested that environmental, socioeconomic demolition and transportation impacts at all sites be evaluated and provide a baseline for each of these resources. Commentors also requested that environmental impacts at sites with increased activity due to consolidation of tritium R&D at some sites be analyzed and to consider the production of tritium and the commercial use of nuclear power reactors for tritium production.</p> <p>Commentors had specific questions regarding Tritium R&D:</p> <ul style="list-style-type: none"> • How many Tritium R&D experiments are conducted annually and will any alternatives reduce the number of Tritium R&D experiments? • Will downsizing of Tritium R&D require new buildings? • Will the downsizing of Tritium R&D have any effect on the location of a CPC? • Do the properties of tritium change? 	4, 1210, 1219	Chapter 3, Sections 2.1.4, 3.8, 3.9, 5.10, 5.17
NNSA Flight Test Operations	<p>Commentors were concerned about effects this alternative would have on the environment and requested that environmental,</p>	4, 47, 104, 1197, 1219	Sections 3.10, 3.10.1, 5.15, 5.15.5, 5.17

Table D.2-2—Summary of Scoping Comments (continued)

Topic 6. Project-Specific Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>socioeconomic, demolition, and transportation impacts at all sites be evaluated and provide a baseline for each of these resources.</p> <p>Commentors also had specific questions regarding flight test operations:</p> <ul style="list-style-type: none"> • How many flight tests are conducted annually and will any alternatives reduce the number tests? • Will the number of tests be reduced under this alternative? • Will the selection of a location for the flight tests have any effect on the location of a CPC? • What are the required geological conditions needed to successfully support all flight testing requirements? • Is it legal to perform these tests on Native American lands? <p>Commentors suggested evaluation of the relocation of the flight test operations without transformation of the whole complex. Commentors were also concerned that flight test operations may stir up radioactive dust from previous ground testing.</p>		<p>The CPC, which is a programmatic decision, has no bearing on the Flight Test Program, which is a project-specific decision.</p>
Major Hydrodynamic Test Facilities	<p>Commentors were concerned about the effects major hydrodynamic test facilities would have on the environment and the impacts of leaving waste from the tests on and in the ground. Commentors suggested that the SPEIS include a comprehensive and detailed presentation of presently planned and reasonably foreseeable hydrotesting capabilities and reasonable alternatives thereto over the full 30-year period covered by the analysis and also requested that environmental, socioeconomic, demolition, and transportation impacts at all sites be evaluated and provide a baseline for each of these resources. Commentors also suggested that the impacts from LANL, DARHT, and LLNL's Site 300 hydrotesting activities be analyzed, list all materials and amounts by isotope used in all types of hydrotesting including non-fissile radioactive isotopes.</p> <p>Commentors requested that DOE explain why LANL performed at least one hydrotest for a speculative RRW design while at the same time it is far behind on hydrotests designed to baseline the safety</p>	2, 4, 104, 1219	<p>Sections 3.11, 3.11.1, 3.11.1.2, 3.11.1.3, 3.11.2.1, 3.11.2.3, 5.16, 5.16.3, 5.17</p>

Table D.2-2—Summary of Scoping Comments (continued)

Topic 6. Project-Specific Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>and reliability of existing nuclear weapons.</p> <p>Commentors suggested that the consolidation of hydrotesting be addressed without transformation of the whole complex and also consider ramping down hydrodynamic testing at all sites.</p> <p>Commentors stated that it seems that NNSA has predetermined the large-scale hydrotesting facility will be located at NTS.</p> <p>Commentors also had specific questions regarding major hydrodynamic test facilities:</p> <ul style="list-style-type: none"> • Is DARHT a large-scale hydrotest facility? • Is moving the location of these sub-critical experiments being considered? • Will any alternative reduce the number of hydrotest experiments? How many experiments are conducted annually? • Will consolidating hydrotesting require new buildings? If so, what are the projected costs? 		
Major Environmental Test Facilities	<p>Commentors were concerned about effects this alternative would have on the environment and requested that environmental, socioeconomic, demolition, and transportation impacts at all sites be evaluated and provide a baseline for each of these resources.</p> <p>Commentors requested that an explanation be provided regarding consolidating environmental test facilities which are contradictory with removing SNM.</p> <p>Commentors question the necessity in future event that production of nuclear weapons is abandoned.</p>	4, 104, 1219	Sections 3.12.1, 5.17

Table D.2-2—Summary of Scoping Comments (continued)

Topic 7. Other Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
Other Alternatives—General	Commentors suggested that DOE identify other alternatives.	5, 774	Sections 3.1
Transportation of Nuclear Materials	Include an alternative which involves little to no transport of nuclear materials.	1210	Section 3.5.1
Disarmament, Dismantlement or Decommissioning Alternatives	<p>Commentors requested an option for disarmament or decommissioning of nuclear warheads and the elimination of the production of nuclear weapon components, the use of the volatile, toxic substances involved in weapons production.</p> <p>Commentors stated that NNSA needs to provide an alternative/plan that will put the warhead complex on a reasonable path toward dismantlement, while also maximizing security, minimizing costs and impacts, retaining a declining nuclear arsenal, and maximizing administrative freedom to pursue paths toward further nuclear disarmament by future administrations.</p>	<p>Campaign 5, Campaign 9, Campaign 12, Campaign 18, 4, 5, 6, 24, 26, 63, 65, 67, 68, 75, 79, 78, 111, 129, 138, 263, 286, 292, 300, 303, 316, 317, 318, 326, 333, 344, 348, 354, 355, 361, 368, 384, 387, 389, 391, 392, 397, 393, 400, 404, 406, 409, 413, 427, 428, 431, 440, 441, 443, 454, 457, 466, 469, 471, 472, 477, 519, 524, 540, 541, 549, 551, 552, 554, 559, 561, 564, 567, 571, 584, 585, 586, 588, 592, 599, 601, 602, 608, 613, 631, 636, 639, 644, 645, 652, 662, 664, 665, 672, 673, 674, 675, 688, 690, 704, 719, 725, 727, 732, 735, 737, 752, 754, 761, 762, 766, 769, 771, 772, 781, 811, 825, 829, 850, 855, 883, 887, 906, 938, 986, 1032, 1041, 1046, 1068, 1076, 1162, 1209, 1210, 1211, 1212, 1215, 1217, 1218, 1220, 1222, 1223, 1224</p>	Sections 2.3.1, 2.3.2, 2.6, 3.15, Chapter 3
Reduce Stockpile Alternatives	Commentors suggested including an option to reduce the current stockpile. Some commentors also suggested an alternative that requires the minimum amount of maintenance on our existing stockpile while simultaneously phasing out our nuclear weapons.	<p>Campaign 12, Campaign 15, Campaign 18, 2, 31, 111, 303, 332, 338, 339, 343, 354, 358, 360, 368, 396, 408, 418, 423, 425, 434, 438, 444, 445, 541, 544, Campaign 18, 571, 581, 569, 594, 872, 639, 643, 677, 678,</p>	Sections 2.1.4, 2.1.5, 2.1.6, 2.1.7, 2.6, 2.6.3, 3.1

Table D.2-2—Summary of Scoping Comments (continued)

Topic 7. Other Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
		697, 710, 734, 735, 737, 738, 741, 749, 781, 825, 826, 830, 850, 938, 952, 1032, 1126, 1219, 1210, 1153, 1154, 1183, 1185, 1190, 1195, 1217, 1220, 1223	
Downsizing-in-Place Alternatives	<p>Commentor questioned whether downsizing of ETFs/ HE R&D/Tritium R&D/ hydrotesting will have an effect on the location selection of a CPC.</p> <p>Some comments received supported the proposal's stated aim for downsizing the nuclear weapons infrastructure.</p> <p>Commentors expressed that downsizing facilities in one place might cause increased activities at other sites. Commentors requested that the SPEIS include environmental impacts of increased activities as a result of downsizing facilities in one place.</p> <p>Commentors suggested that DOE provide an alternative with a consolidated network with refined capability with smaller size and maximum production.</p>	Campaign 7, 4, 673, 877, 1210	Chapters 3, 5, Sections 3.4.1, 5.17
Responsible Curatorship Alternatives	<p>Commentors requested that DOE include an alternative that evaluates a “Responsible Curatorship” case for the full range of reasonable stockpile sizes, that is built on the premise that no new or replacement nuclear components will be fabricated for the entire period covered by the SPEIS, and that pit and secondary refurbishment operations will be kept to the minimum level consistent with continued reliability and safety.</p>	Campaign 19, 2, 4, 6, 9, 32, 129, 529, 544, 747, 1083, 1218, 1219, 1220, 1222, 1223	Chapter 3, Section 3.15
Alternatives That Comply With the NPT	<p>Numerous commentors suggested alternatives that comply with the NPT. Commentors stated that an alternative should be added which would comply with [“comply with” or “satisfy” rather than “meet”?] the NPT by reducing current operations at active facilities to those necessary to perform critical storage, disassembly, dismantlement, and disposition missions. This alternative will put the warhead complex on a reasonable path toward dismantlement, while also maximizing security, minimizing costs and impacts, retaining a declining nuclear arsenal, and maximizing</p>	6, 367, 1056, 1095, 1134, 1135, 1212, 1220	Section 2.1.4, Chapter 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 7. Other Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>administrative freedom to pursue paths toward further nuclear disarmament by future administrations</p> <p>Under an alternative that complies with the NPT, there would be no need to make pits; therefore, there is no need for a consolidated pit production facility, no need to operate LANL's TA-55 facilities for pit production, and no need for a CMRR.</p>		
Comprehensive Test Ban Treaty Alternatives	Commentor suggested to be consistent with the CTBT define and evaluate an alternative that involves the complete cessation of NNSA weapons activities at NTS and the elimination of any underground nuclear experiments, wherever located.	2	Section 2.1.3
Security Alternatives	Commentors suggested including an option to secure current weapons inventory.	Campaign 12, 281, 320, 458, 464, 465, 111, 639, 781	Section 2.3.5
Safety Alternatives	Commentors suggested analyzing an option to store toxic materials like plutonium and HEU as safely as possible.	672	Sections 2.3.5, 3.5, 3.7
Alternatives Involving Policy	<p>Commentors suggested that DOE must analyze for an alternative where nuclear deterrence is not the cornerstone of U.S national security policy and for an alternative in which the U.S. complies with Article IV of the U.S. Constitution.</p> <p>Commentors also suggested another way to increase our nation's security such as providing an alternative that aims to reduce the role of nuclear weapons in U.S. security strategies.</p>	Campaign 12, 5, 111, 570, 571	Section 2.3.5, Chapters 2, 3
Test readiness Alternative	Commentors stated the test readiness alternative should include an analysis which includes answers to issues relating to environmental impacts of maintaining test readiness; ability to certify the design of a nuclear weapon without testing; national and international environmental and public health impacts from past nuclear weapons testing; and the projected costs of compensation under the Radiation Exposure Compensation Act.	5	Chapter 3
Site Alternatives	<p>Numerous commentors suggested alternative uses for candidate sites:</p> <ul style="list-style-type: none"> Consider lowering production at LANL and forget about the rest of the other potential locations. Provide an alternative where LANL is used for better benefits 	2, 4, 9, 24, 30, 31, 32, 75, 264, 692, 747, 879, 1218, 1224, 1217, 1222	Sections 1.5.4.2, 2.3.3.2, 2.5, 3.1, 3.4.1.6, 3.6, 3.7.2, 3.15, Chapters 2, 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 7. Other Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>than creating more nuclear weapon systems, consolidating plutonium, etc.</p> <ul style="list-style-type: none"> • The current production level of 20 pits per year at LANL is sufficient for maintaining deterrence. • Commentor urged that analysis of major new projects covered by the ongoing Y-12 and LANL SWEIS be placed on hold and made subordinate to the analysis and outcomes of this SPEIS. • Removal of nuclear materials/waste from LLNL • It would make economic, security, and logistical sense to consolidate a portion or all activities at LANL, Pantex and/or Sandia (southwestern triangle). • Suggest stopping the CMRR project since this building would become obsolete by the new consolidated plutonium facility. Instead co-locate future production capacity and radiological chemistry materials research workout. • DOE should consider the alternatives of joint operations of new LLNL facilities with other federal agencies such as DHS, FBI, NASA. • Convert nuclear weapons labs to facilities that promote technologies that meet human needs. • Analyze plutonium at existing Category I/II SNM sites, uranium at Y-12, A&D at Pantex, and tritium at SRS as an alternative without the so-called transformation and with existing facilities that could be downsized and consolidated. • Alternative missions for present day weapons sites must also be considered. • Develop alternative options for the research conducted at our national labs that would benefit our planet. • Define alternative consolidation plans for specific areas including hydrodynamic testing, strategic computing, environmental testing, flight testing, fissile material operations and storage, non-nuclear component fabrication, HE and detonator fabrication and testing and tritium operations and R&D. • Terminate all bomb development related tests and analyze the 		

Table D.2-2—Summary of Scoping Comments (continued)

Topic 7. Other Alternatives

Subtopic	Comment Summary	Documents	SPEIS Reference
	safest and secure locations to conduct maintenance tests.		
Nonproliferation Alternative	Commentors suggested that NNSA develop an alternative that focuses on nonproliferation. Include an alternative that excludes NNSA complex support for weapons and capabilities required to implement illegal preemptive and preventive nuclear attacks on other states that might in the future seek to arm themselves with weapons of mass destruction.	Campaign 5, Campaign 9, 2, 63, 213, 368, 387, 850, 734, 768, 1166, 1209, 1210, 1221, 1223, 68	Sections 1.2, 2.1.3, 2.1.4, 2.3.1, 2.3.2
Cleanup Alternatives	Commentors suggested that resources and expertise of national laboratories should be directed toward cleanup.	Campaign 4, Campaign 5, Campaign 6, Campaign 9, Campaign 12, Campaign 18, 1, 55, 164, 260, 287, 300, 303, 317, 318, 333, 368, 372, 380, 471, 499, 501, 525, 540, 541, 552, 555, 584, 585, 631, 681, 691, 747, 768, 781, 811, 861, 897, 962, 998, 1059, 1104, 1111, 1208, 1210, 1217, 1218, 1220, 1221, 1222, 1223, 1224	Chapter 2, Chapter 3, Section 3.15
New Triad	Commentors suggest providing alternatives that support the "New Triad" and the balance it brings concerning enemies and allies and discusses what the effects are of not having met the needs of this New Triad.	4	Section 2.3.1
Alternatives Promoting Peace	Commentors suggested that DOE should pursue more diplomatic alternatives, pursue the process of scientific conversion of military production to peaceful uses. Commentors also suggested an alternative where security is provided through conflict resolution and mediation.	Campaign 4, Campaign 6, 592, 1216	Section 3.15, Chapters 2, 3
Future of the Nuclear Weapons Complex	Commentors stated that the EIS should cover a range of alternatives that future presidents and Congress would face regarding our nuclear weapons Bombplex and abandon plans to build new nuclear weapons.	12, 57, 223, 326, 343, 358, 360, 396, 408, 418, 423, 425, 434, 444, 525, 710, 747, 749, 781, 938, 944, 1209, 1224, 1217, 1222, 1223	Section 3.1

Table D.2-2—Summary of Scoping Comments (continued)

Topic 8. Reliable Replacement Warhead

Subtopic	Comment Summary	Documents	SPEIS Reference
RRWs—General	A commentor expressed that the RRW program must be viewed as optional.	2	Sections 2.5, 2.5.1, 2.5.9
Opposition to RRWs	Commentors oppose the RRW because the RRW is not a legitimate element of the scope in this process and could imperil national security by substituting untested designs for already tested ones. Commentors also state that the RRW will promote nuclear proliferation.	4, 22, 32, 128, 168, 326, 1104, 1205, 1210	Section 2.5
RRWs and Pit Production	Commentors requested a discussion about the life cycle management of existing pits inventories and how new production will fit into existing management and disposition systems and questioned if different margins are expected for different pit sizes.	4, 26, 27, 587	Sections 2.5, 3.4.1
RRW—Analysis	Commentors submitted comments associated with the type of analysis that should be included regarding the RRW. These included: <ul style="list-style-type: none"> Clarify the role of the RRW program as currently envisioned in Complex Transformation. Analyze the environmental impacts for all RRW design concepts in the draft SPEIS. 	5, 1218	Section 2.5
Questions Regarding the RRW	Commentors submitted comments with questions on the RRW. These included: <ul style="list-style-type: none"> How long will it take to produce an RRW to respond to geopolitical change? And why aren't current ones suited for this considering most types are understood to be variable yield? Will our needs for a responsive infrastructure and war be the same in 2030 as they are now? How would RRW, as new warheads be used towards emerging threats? Would they have a new military mission compared to existing U.S. nuclear weapons and if so this seems contrary to congressional intent? Why are new weapons designs not mentioned in stockpile management activities on the fact sheets or under the proposed action? 	4, 503	Section 2.5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 8. Reliable Replacement Warhead

Subtopic	Comment Summary	Documents	SPEIS Reference
	<ul style="list-style-type: none"> What is the true need for new design nuclear weapons and for the production of 125 pits per year? Will there be a time when there will be both RRW warheads and the warheads they are replacing in the stockpile? 		
Relationship Between the RRW and Complex Transformation	<p>Commentors questioned the relationship between the development of RRWs and alternatives for Complex Transformation.</p> <p>Commentors stated that if the complex must be reformed with or without new RRW designs, how can the RRW be the "enabler" for the project. Justification for the project seems to be a moving target therefore it is hard to discern if this SPEIS is for support of the existing stockpile, new design nuclear weapons, or some combination of the two.</p> <p>Commentors stated that expanded pit production is primarily about RRW pits for new nuclear weapons design and is the driver for the 125 pits per year desired level of production.</p>	4, 1219	Sections 2.5, 2.3.1
Question the Need for RRWs	Numerous commentors questioned the need for RRWs and the need to replace refurbished warheads with RRW warheads when a recent report indicates that the existing stockpile is not degrading.	4, 516, 603, 876, 942, 947, 1064, 1065, 1190, 1192, 1211, 1046, 1058, 1216	Section 2.5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 9. Cost and Schedule

Subtopic	Comment Summary	Documents	SPEIS Reference
Cost-Effectiveness of Existing Nuclear Weapons Complex	Several comments were received regarding concern about the cost of the project and questioned anticipated costs, costs of accidents, and remediation efforts. Commentors also questioned the cost-effectiveness of Complex Transformation when DOE claims that the SSP is not failing after spending \$90 billion. Why then is the Program not adequate for maintaining the stockpile? How can increased costs for Complex Transformation be justified? Explain why the existing nuclear complex can't be made more cost effective. What needs to be changed to update it?	Campaign 2, Campaign 5, Campaign 4, Campaign 6, Campaign 7, Campaign 9, Campaign 10, Campaign 17, Campaign 18, 3, 4, 9, 10, 31, 75, 104, 107, 109, 110, 203, 208, 210, 303, 329, 335, 344, 351, 355, 367, 368, 391, 395, 402, 430, 432, 437, 445, 460, 525, 567, 584, 674, 689, 690, 693, 740, 727, 731, 732, 735, 738, 753, 752, 754, 765, 845, 860, 951, 955, 401, 1084, 790, 1089, 1100, 1126, 1218, 1142, 1143, 1149, 1161, 1162, 1200, 1209, 1210, 1220, 1223, 1217, 1218, 1219, 1222, 1223	Chapter 2, Section 3.1
Better Use of Resources	Numerous commentors provided suggestions for better use of resources. These include: <ul style="list-style-type: none"> Funds should be spent on maintaining safety and security at existing sites Funds should be spent on dismantlement Funds should be spent on infrastructure 	Campaign 1, Campaign 19, 1, 5, 12, 19, 66, 67, 74, 77, 80, 96, 104, 109, 110, 126, 132, 133, 138, 153, 191, 368, 390, 541, 380, 320, 585, 684, 691, 692, 723, 740, 747, 758, 769, 783, 894, 1081, 1104, 1111, 1117, 1188, 1137, 1200, 1205, 1206, 1208, 1209, 1057, 1205, 1209, 1210, 1212, 1211, 1218, 1224, 1220, 1222	Chapter 2, Section 3.1
Factors That Could Increase Proposed Costs	Commentors expressed concern regarding factors that could increase proposed costs and requested additional discussion. Factors included: <ul style="list-style-type: none"> Security Increased mitigation and environmental restoration 	4, 1218, 1217, 1223	Chapter 2, Section 3.1
Cost of Cleanup	Commentors questioned the cost of the current cleanup that is needed.	1213	Chapter 2, Section 3.1

Table D.2-2—Summary of Scoping Comments (continued)

Topic 9. Cost and Schedule

Subtopic	Comment Summary	Documents	SPEIS Reference
Cost of Each of the Alternatives	<p>Commentors submitted comments on the cost of each of the alternatives and questioned if construction and operation costs would be the same at each candidate site. Commentors requested a discussion of the cost of siting the CPC at each of the candidate sites.</p> <p>A specific comment was submitted regarding TTR and remediation costs of associated with moving testing operation from TTR would be cost effective compared to keeping the testing at TTR. [Edit—words missing.]</p> <p>It was also suggested that transition to lower cost of operations for NNSA, without so-called transformation of the complex, be analyzed.</p>	4, 9, 685	Chapter 2, Section 3.1
Cost-Benefit Study	<p>Commentors requested the inclusion of a cost-benefit analysis of different alternatives (ETF/JFTP [joint flight testing program?]/HE R&D/Tritium R&D/Hydrodynamic Testing costs; an estimated breakout of all costs of downsizing-in-place and/or eliminating specific activities at sites performing Environmental Testings/JFTP/HE R&D/ Tritium R&D/Hydrodynamic Testing) including SNM consolidation without transformation and SNM consolidation as part of transformation.</p> <p>The cost-benefit analysis should also be based on a life cycle budget for the project including not only the cost of construction, but operation, decommissioning and waste disposal</p>	4, 5	Chapter 2, Section 3.1
Timeline	<p>Commentor submitted questions regarding the timeline of the proposal. These included:</p> <ul style="list-style-type: none"> • Is the schedule different for each site? • Explain rationale for the order of the baseline CPC schedule? Why approve the Mission Need (CD-0) in 2008? Will it be before the ROD? Isn't that prejudicial? Will the decision to proceed with the CPC be made in the ROD? 	4	Chapters 2 and 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 10. Candidate Sites

Subtopic	Comment Summary	Documents	SPEIS Reference
Candidate sites—General	<p>Commentors submitted comments regarding candidate sites that were general in nature. While many commentors provided comments on specific sites, other comments stated:</p> <ul style="list-style-type: none"> • DOE must consider the psychological impact of living in a state with four sites devoted to nuclear weapons activities, as well as being the birthplace of the atomic bomb, and the site of its first detonation. • In order to comply with the 'no new plutonium sites' determination, plutonium activities should be placed at sites which currently have facilities with a history of safe plutonium operations. • Consider the synergistic impact of the location of two of the nation's nuclear weapons laboratories (LANL, SNL/NM) located within 60 miles of one another in New Mexico. • Discuss the reduction of NNSA sites. • The SEAB 2005 report contradicts the criteria for candidate site consideration (i.e., population encroachment) in the NOI stating that the majority of sites are bordered by residential and/or commercial communities. • Find financial means to make reparations to those communities whose soil, air and water have been contaminated. 	Campaign 12, 4, 5, 73, 111, 540, 792, 1218, 1208	Sections 2.3.4, 3.14, 4.1, 4.1.9, 4.6.9, 5.5.15, 5.9.15
LANL (New Mexico)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at LANL, these included:</p> <ul style="list-style-type: none"> • New studies need to be conducted to analyze the social, environmental, economic, and health impacts associated with an expansion at LANL. • Concern about safety from toxic wastes for residents residing upwind of Los Alamos. • Explain how NNSA came up with the 40% reduction of nuclear facility space at LANL. • Concern for safety and liability issues especially since security and environmental responsibility at LANL is lacking. • Provide justification for increasing the production at LANL from ~20 ppy to 200 ppy at a cost of ~\$4 billion. • LANL’s mission should be redirected to cleanup and securing 	Campaign 12, 2, 4, 5, 6, 73, 77, 111, 146, 209, 327, 333, 781, 792, 1128, 1215, 1217, 1218	Sections 1.1, 1.2, 1.5.3, 1.5.4.2, 2.3.3.2, 3.11.1.2, 3.4.1.5, 3.4.1.6, 3.7, 4.1, 4.1, 5.1, 5.1.4, 5.1.12, 10.6, Chapters 2, 4

Table D.2-2—Summary of Scoping Comments (continued)

Topic 10. Candidate Sites

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>the existing stockpile and waste.</p> <ul style="list-style-type: none"> • Explain why LANL was selected as a candidate site when its location is not favorable (on top of a windswept mountain, on an earthquake fault, in a wildfire zone, and at the source of a watershed that serves 10 million people). • Discuss containment methods for DARHT and explain if they conform to the DARHT EIS ROD. • Provide a discussion on facilities containing SNM and the management of these facilities by another group if by 2022 LANL is not expected to operate facilities containing Category I/II SNM. • Concern regarding LANL’s future direction. • The decision to locate a CPC at LANL is prejudicial and premature until a decision regarding the CMRR is made. • Concern regarding LANL’s chances of actually producing 10 certified W88 pits when it has yet to produce a certified pit. • LANL’s current weapons-related plutonium infrastructure should be more than sufficient to meet the needs of maintaining the U.S. nuclear stockpile. • Suggest performing another more updated EIS. • Concern about DOE's poor decision-making as shown in the decisions regarding the FXR facility the DARHT facility. <p>Some commentors also submitted comments in reference to the LANL SWEIS.</p>		
LLNL (California)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at LLNL, these included:</p> <ul style="list-style-type: none"> • Complex Transformation plan should terminate high explosives tests at Site 300 and concentrate on cleanup there and the main site. Address issues of encroachment to surrounding recreational and residential areas of pollutants from explosive testing. • LLNL would not be a suitable location because of its dense population, small facility and transportation and storage problems. LLNL is also a Superfund Site. • Direction from Congress to remove weapons usable material 	4, 9, 32, 1219, 1220, 1222	Sections 3.2.2, 3.3.1, 3.7.2, 3.8.1.1, 3.9.5.3, 3.13.2, 3.15, 4.2, Chapter 10

Table D.2-2—Summary of Scoping Comments (continued)

Topic 10. Candidate Sites

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>from LLNL.</p> <ul style="list-style-type: none"> • Complex Transformation would add to the already existing 2-mile plume that extends to the City of Tracy. • Discuss the closure of LLNL. • Discuss the role of the National Ignition Facility mega laser in Complex Transformation. • Concern regarding continued tritium operations. • Suggest phasing out operations at LLNL and move to LANL and make LLNL an alternative energy plant. • Concern regarding documentation by Tri-Valley CAREs showing the threat at least three-quarters of a million curies of tritium have come out of the twin stacks of Building 331. • Evaluate a proposal to place a National Bio and Agro Defenses Laboratory at LLNL. 		
NTS (Nevada)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at NTS, these included:</p> <ul style="list-style-type: none"> • NPR indicates concern over current 2-3 yr. nuclear test readiness at NTS which may not achieve the stated goal of a "responsive" complex. • Need to be very clear and explicit regarding assembly and disassembly of nuclear weapons at NTS as it is a new activity and not analyzed in the NTS SWEIS. • Discuss plan for an Advanced Hydrotest Facility. • Clarify how the mission of the NTS is to be realigned. • Evaluate to what extent the NTS would be a consolidation site. • Missions at NTS related to sub-critical tests are inconsistent with the proposed action. • NTS is an unsuitable location for siting the proposed CPC. • Discuss impacts, if sited at NTS, the proposed action would have on Yucca Mountain. • Consider impacts to Nellis Air Force Base, Area 5 and Area 3. • Concern in DOE’s poor decision-making as shown in the decisions regarding the AHF at NTS. 	2, 4, 215,587, 1048	Sections 2.1.2, 2.3.1, 3.2.3, 3.4.1, 3.12.3, 3.14.3, 6.2.3, Chapter 2, 3, 4
TTR (Nevada)	Commentor suggested that TTR be considered as a site for	793	Section 3.5.1, 3.10.1

Table D.2-2—Summary of Scoping Comments (continued)

Topic 10. Candidate Sites

Subtopic	Comment Summary	Documents	SPEIS Reference
	consolidation.		
Pantex (Texas)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at Pantex, these included:</p> <ul style="list-style-type: none"> • Examine integrating test flight operations with existing DoD test capabilities such as TTR. • Consider the dangers of airports in the area or consider moving location of flight paths so they are not over Pantex. • Pantex is not ready for W88 production because of shortage of existing resources. • Dismantlement should be given priority over weapons programs. • Stated that Pantex should not be considered a reasonable candidate site when Pantex has public access to fence lines that are only a short walk from the border of the site. 	4, 6, 73, 792, 1125, 1207, 1224	Sections 3.2.3, 3.10.4, 3.15, 4.5, 5.5.12
SNL (New Mexico)	<p>Commentor submitted comments requesting the following discussion for SNL/NM be included:</p> <ul style="list-style-type: none"> • Discuss the role SNL will play in certifying the plutonium pits. • Discuss the increased potential for tritium releases. • Discuss the increase in explosive components testing and the release of toxic contaminants. • Discuss if SNL will be operating its thermal treatment unit and what toxic pollutants will be released. • Discuss the potential for tritium accidents that can occur at SNL. • Suggest preparing a more updated EIS and specifically address water consumption rates. 	1217	Sections 3.2.6, 3.9.1.4, 3.12.1.3, 5.13, Chapters 2, 4
SRS (South Carolina)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at SRS, these included:</p> <ul style="list-style-type: none"> • Clarify if the SRS SNM is included in the consolidation. Is consolidation aimed at both weapons and non-weapons related SNM? • Consider that the attitude at SRS concerning support for Complex Transformation at SRS does not reflect the opinion of the entire state. 	4, 405	Section 3.7.1.3, Chapter 3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 10. Candidate Sites

Subtopic	Comment Summary	Documents	SPEIS Reference
Y-12 (Tennessee)	<p>Commentors submitted comments regarding the siting of “Complex Transformation” at Y-12, these included:</p> <ul style="list-style-type: none"> • Objection to the counter-productive exclusion of options for consolidating uranium, secondary, and case fabrication activities currently performed at Y-12 and the declared intention to press ahead with an EIS and ROD covering modernization of Y-12 capabilities even as the Complex Transformation SPEIS is underway. • Concern about soil, water, and air pollution caused by Y-12. • Concern about the construction of the HEU Facility in reference to the proposed construction of the CNPC at Y-12. • Suggested that environmental cleanup of the site be included as a key component. • Expressed support for Y-12 remaining the weapons’ complex center of excellence for uranium and other SNM. • Expressed concern about beryllium toxins in Oak Ridge. • Stated that Y-12 should not be considered a reasonable candidate site when Y-12 has public access to fence lines that are only a short walk from the border of the site. 	2, 73, 208, 322, 792, 795, 1129	Sections 1.5.4.2, 3.2.9, 3.5.1.1, 4.9, 5.9.12, Chapter 10

Table D.2-2—Summary of Scoping Comments (continued)

Topic 11. Additional Analysis

Subtopic	Comment Summary	Documents	SPEIS Reference
Additional Analysis— General	<p>Comments were received requesting that additional analysis be conducted. General comments included:</p> <ul style="list-style-type: none"> • Site-specific EIS evaluations and impact mitigation strategies for all potential CPC sites must be completed in the Draft SPEIS. • Separate impact studies should be conducted for downwind and down gradient communities. • SPEIS must list the number of augmentation weapons, reliability-reserve weapons and weapons to fulfill NATO commitments. 	4, 536	Sections 2.3, 4.x.4.11 for all sites, Chapter 5
Nuclear Weapons Activities	<p>Commentors submitted comments regarding additional analysis pertaining to nuclear weapons activities. These included:</p> <ul style="list-style-type: none"> • Analysis of historical, current, and international consequences due to U.S. nuclear weapons activities, including who have been impacted internationally, as well as locally, regionally, and nationally by the proposed future activities; who have benefited from the past nuclear weapons activities; how U.S. nuclear weapons have increased global security; and environmental and health impacts (nationally and internationally) from Cold War arms race. • Include analysis of possible use of one weapon currently in stockpile, an advanced concept, or RRW from smallest nuclear weapon to largest. • Include analysis showing the number of DOE-sponsored hydrodynamic shots at each site that are devoted to in whole or part of nuclear weapons development and for those that are strictly for maintenance. • SPEIS must list the number of augmentation weapons, reliability-reserve weapons and weapons to fulfill NATO commitments. • Clarify reliable or usable nuclear stockpile of weapons. • Study the phase-out of duplicative facilities. 	5, 9, 263, 1219, 1222	Sections 2.1, 2.2, 2.5, .5, 3.7, 3.8, 3.9, 3.11, 3.12, Chapter 5
Special Nuclear Material	Amount of SNM declared as surplus should increase as disarmament advances. Discuss how materials would be	9	Section 6.2.4, 6.3.4

Table D.2-2—Summary of Scoping Comments (continued)

Topic 11. Additional Analysis

Subtopic	Comment Summary	Documents	SPEIS Reference
	immobilized in forms that are difficult to assess and retrieve under the NPT Compliance/Disarmament Alternative.		
Environmental Analysis	<p>Commentors submitted comments regarding the analysis of environmental impacts. These included:</p> <ul style="list-style-type: none"> • DOE should provide a thorough analysis of the environmental effects of dismantling international anti-proliferation treaty and disarmament efforts with special attention to the U.S.'s effect on the international community as the world's superpower. • Include analysis focusing on global environmental effects from developing new nuclear weapons and furthering the nuclear arms race. • Due to increased rains a study of global warming and the increased flash floods needs to be done. Past studies will not be adequate if we are facing more storms and more runoff during the summer. 	Campaign 18, 31, 75, 339, 1128	Chapter 5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 12. Kansas City Plant

Subtopic	Comment Summary	Documents	SPEIS Reference
KCP—General	The KCP should be relocated to Albuquerque to save travel between sites and facilities	574	Sections S.3.2.10, 1.5.2.1, and Chapters 1, 2
Objection to Exclusion of KCP	<p>Commentors object to the exclusion of KCP, as it blatantly seeks to prejudice and preempt the consideration of cost-effective complex consolidation options that would redistribute remaining KCP missions and capabilities to LANL and SNL where some 10% of KCP employees are already assigned. Commentors also state that the full cost of Complex Transformation is not being represented by the exclusion of KCP.</p> <p>Commentor also objects to the exclusion of an analysis of further non-nuclear consolidation and production modernization at the KCP as it seeks to prejudice the consideration of cost-effective complex consolidation options that would redistribute remaining KCP missions and capabilities to LANL and SNL.</p>	2, 4	Sections S.3.2.10, 1.5.2.1, and Chapters 1, 2
NEPA Analysis for KCP	Commentor questions where and what is the status of the separate NEPA analysis that the Complex Transformation NOI cites for KCP.	4	Sections S.3.2.10, 1.5.2.1, and Chapters 1, 2

Table D.2-2—Summary of Scoping Comments (continued)

Topic 13. Waste Isolation Pilot Plant

Subtopic	Comment Summary	Documents	SPEIS Reference
WIPP—General	<p>Commentors submitted comments that were general in nature regarding WIPP. These included:</p> <ul style="list-style-type: none"> • Commentors questioned what other WIPPs or extensions of WIPP are being considered for Complex Transformation. • Commentor suggested that WIPP or WIPP substitutes and TRU waste final disposition need to be considered and analyzed. • Not one site in the complex has been cleaned up because of WIPP. • Include an analysis on impacts of transportation of waste, not only to WIPP, but also to subsequent disposal facilities. 	4, 5, 1218	Sections 5.10, 5.11, 10.5.5
WIPP as a Candidate Site	Commentor requested an explanation as to why WIPP/Carlsbad was not considered as a site for Complex Transformation.	1218	Sections 3.1, 3.2, 3.3
Future of WIPP	Commentors questioned the plans for future waste disposal after WIPP is closed.	4, 5	Section 10.5.5
Support for WIPP as a Candidate Site	A commentor expressed support for Carlsbad because it has remote location to promote security, has the community support for nuclear weapons production, has two national labs, and has complete radiological monitoring capabilities.	1218	Sections 3.1, 3.2, 3.3, 10.5.5
Opposition to WIPP	<p>Commentor expressed opposition to WIPP being redeveloped or maintained in NM or any other State.</p> <p>Another commentor expressed opposition to siting a Complex Transformation facility at WIPP/Carlsbad.</p>	216, 1218	Sections 3.1, 3.2, 3.3, 10.5.5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 14. Sabotage and Terrorism

Subtopic	Comment Summary	Documents	SPEIS Reference
Sabotage and Terrorism— General	<p>Commentor expressed concern about possible safety breaches at Y-12.</p> <p>Commentor stated that production of nuclear weapons and consolidation of storage of nuclear materials at one site would provide one target that is more susceptible to terrorist acts.</p>	<p>33, 71, 96, 104, 221, 286, 320, 374, 405, 450, 562, 525, 526, 723, 731, 845, 955, 1102, 1210, 1176, 1210, 1222, 1223</p>	<p>Section 1.1.2, Appendix H</p>
Evaluation of Sabotage and Terrorism	<p>Commentors generally expressed the opinion that Complex Transformation could be targets for sabotage and/or terrorism (intentional destructive acts).</p> <p>Commentors suggested that the SPEIS address safety issues and security risks if security is breached, calculate human error risks, and analyze the possibility of construction of an improvised nuclear device made from stolen or diverted plutonium or HEU.</p> <p>Several commentors expressed concern with risks associated with shipment of nuclear materials. Analyze terrorist attack associated with transportation of nuclear materials.</p> <p>Commentors requested that the SPEIS consider the additional security and emergency response capabilities that may be needed by the local governments immediately adjacent to facilities.</p>	<p>Campaign 7, Campaign 14, Campaign 19, 4, 5, 9, 31, 184, 191, 294, 329, 383, 405, 460, 516, 636, 725, 770, 861, 1083, 1188, 1187, 1209, 1213, 1217, 1218, 1219</p>	<p>Section 21.1.2, .3.5, Sections 5.x.12 for all sites, Appendix C, Appendix H</p>
Suggested Actions To Protect Against Sabotage and Terrorism	<p>Commentors expressed a concern over the possibility of sabotage and/or terrorism. Commentors provided suggested actions to protect against sabotage and/or terrorism. These included:</p> <ul style="list-style-type: none"> • Commentors expressed the need to consider possibility of accidental or intentional detonations of nuclear devices by accident or terrorist attack. • One commentor urged that tighter oversight and more token enforcement be applied at all levels of the mission. • Commentor requested an analysis of whether existing programs can be used to meet unanticipated events, instead of Complex Transformation. • Commentor suggested that a security assessment be done to provide input on the various ways the material will be made 	<p>4, 5, 9, 10, 322, 466, 568, 1044, 1213, 1216</p>	<p>Sections 1.1.2, 2.3.5, Chapter 2, Appendix C, Appendix H</p>

Table D.2-2—Summary of Scoping Comments (continued)

Topic 14. Sabotage and Terrorism

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>vulnerable including storage, transportation, loading/unloading, packaging, processing, etc.</p> <ul style="list-style-type: none"> • Commentor suggested that an evaluation of the complex-wide safety and security problems be conducted and include plans to address these issues. • Commentor requested an explanation of the insecurity of current plutonium operations and the need for increased security. • Provide detailed analysis of expected increased safety that will occur. As a baseline, provide potential impacts of maintaining the current level of security and safety along with the impacts of upgrading current security. • Suggestion to perform an investigation into each police officer's background for terrorist activities or corruption; abuse of U.S. citizen, motorists and visitors; and the potential threat to U.S. security before storage of any nuclear material at one site. 		
LANL	<p>Some commentors had specific concerns on the risk at LANL. Some LANL facilities are relatively vulnerable to attack from the ground; most are vulnerable from the air. A commentor also stated that Complex Transformation threatens the LANL community with increased risk of warhead production.</p> <p>Another commentor stated that transportation of larger amounts of plutonium makes LANL a target for a terrorist attack.</p>	4, 6, 10, 320, 538	Sections 5.1.12, 5.2, Appendix H
Pantex	<p>Commentors had specific concerns on the risks at Pantex. Given the proximity of the airport to Pantex, constant air traffic, and addition of more dangerous operations, the consequences of a terrorist attack should be evaluated</p>	Campaign 20, 954, 1224	Appendix H
LLNL	<p>Commentors had specific concerns on the risks at LLNL. LLNL's plutonium should be moved only once and should not be used in new nukes. Moving plutonium twice is not safe or secure.</p>	4, 9	Section 3.7.2

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
Land Use			
Land use—General	<p>Commentor requested existing square footages and proposed square footages for all facilities (existing, proposed and proposed to be eliminated) and analyze environmental impacts at sites with increased activity due to consolidation of SNM at some sites.</p> <p>Another commentor suggested that cumulative impacts section include local renovation, expansion, and development information in the ROI. Commentor also suggested that all candidate sites complete a Land Use Management Plan EIS.</p>	4, 1225	Sections 3.4, 3.5, 3.6, 4.x.1 for all sites, 4.x.3 for all sites, 5.12
LANL	<p>Commentors provided specific comments on LANL land use. These included:</p> <ul style="list-style-type: none"> • Provide impacts of SNM on land use. • Provide impacts to pueblos and sites where facilities are to be developed. 	1217, 1219	Section 5.1.1
Pantex	<p>Commentors provided specific comments on Pantex land use. These included:</p> <ul style="list-style-type: none"> • Will the land area of Pantex need to be expanded? • Complete a full analysis of land use. 	330, 1212	Section 5.5.1
Visual Resources			
NTS	<p>Commentor requested that the SPEIS include an assessment of mitigation measures (use of existing facilities/infrastructure, "dark sky" measures, logical improvements and use of appropriate screening/structure colors) that can be included to abate cumulative visual impacts. Commentor also expressed concern on cumulative visual impacts to public land users' experiences.</p>	173	Section 5.3.1, 5.3.2
Site Infrastructure			
Site Infrastructure—General	<p>Commentor stated that specific information on supplier plans to meet expectations of increased demand on site infrastructure resources must be provided in detail.</p>	1225	Section 4.x.3 for all sites

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
LANL	<p>Commentors provided specific comments on LANL site infrastructure. These included:</p> <ul style="list-style-type: none"> • TA-55 remains without adequate continuous power supply. • Entire LANL site lacks a secure electrical power grid. • Concern that infrastructure and operation budget has been scaled back to account for future missions activities with subsequent inadequate reinvestment in HVAC and fire systems. • Concern that LANL still lacks ventilation and monitoring systems at PF-4 which will continue to function following serious accidents. LANL was still insisting on applying this same loose approach to its proposed new CMRR facility. • LANL does not have infrastructure to support Complex Transformation operations. 	6	Sections 4.1.3, 4.1.12
Pantex	<p>Commentors provided specific comments on Pantex site infrastructure. These included:</p> <ul style="list-style-type: none"> • Provide discussion of facilities that will be used and any modifications or new facilities that will be needed for the storage of SNM. • Provide water and utility needs be for the various combinations of current work. 	330	Sections 3.7.3, 5.5.3, 5.5.4, 5.12.3
SRS	<p>Commentors stated that SRS has modern infrastructure with large-scale plutonium experience and national lab with core competency in plutonium R&D and is capable of handling operations dealing with Complex Transformation construction and operation.</p>	922, 928, 929, 930, 931, 932, 933, 934, 935, 936, 912, 913, 915, 916, 918, 919, 920, 1212	Section 3.2.8
Y-12	<p>Commentor stated that investment in the modernization of Y-12 must continue to ensure safe, secure working conditions.</p>	1129	Section 3.3.1
Air Quality and Noise			
Air Quality and Noise—General	<p>Commentors provided comments on air quality and noise that were general in nature. These included:</p> <ul style="list-style-type: none"> • Incorporate plants and all other parts of the ecosystems that may be damaged by ozone. • NNSA must publish and make publicly available prior to the issuance of the Draft SPEIS a comprehensive list of "duplicative facilities." The Draft SPEIS must analyze the various alternatives for eliminating such duplicative facilities. 	525, 1225	Sections 3.8, 3.9, 3.11, 3.12 4.x.7 for all sites

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
LANL	<p>Commentors provided specific comments on LANL air quality and noise. These included:</p> <ul style="list-style-type: none"> • LANL must be required to reevaluate and broaden their air sampling programs. • Complex Transformation will increase dangerous air emissions. • Concern that no air quality studies, health studies or EJ studies have been performed downwind from LANL even though LANL has violated the CAA through its emissions. 	206, 536, 1128, 1218, 1221	Sections 4.1.4, 5.1.4,
Water Resources			
LANL	<p>Commentors provided specific comments on LANL water resources. These included:</p> <ul style="list-style-type: none"> • Expressed concern that chemicals and radionuclides have been found in plumes close to drinking water sources near Los Alamos and springs that feed the Rio Grande, which is a drinking water source and the largest source for irrigation water in NM. • Provide explanation on how NNSA proposes to remediate the aquifer under LANL. • Stated that data collected from groundwater wells at LANL is unreliable and that DOE is not in compliance with DOE Order 450.1 Environmental Protection Program, which requires LANL to have a groundwater surveillance monitoring program in place by December 31, 2005. • Expressed concern that proposed activities would increase water usage above the amount allotted to it from the regional aquifer. • Concern that groundwater contaminants from current operations have moved off-site and are contaminating the drinking water supply wells for Los Alamos County and the Buckman Wellfield, where over 40% of Santa Fe's drinking water supply is located. 	Campaign 12, 5, 48, 67, 96, 111, 206, 300, 320, 324, 536, 538, 507, 590, 684, 781, 1056, 1104, 1217, 1218, 1221, 1223	Sections 4.1.5, 5.1.5
LLNL	<p>Commentors provided specific comments on LLNL water resources. Commentor expressed concern about the serious problem of uranium in the water table. Another commentor questioned how many years before the water on the earthquake fault will be affected around LLNL.</p>	1219, 1220	Sections 4.2.4, 4.2.5, 4.2.6

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
NTS	<p>Commentors provided specific comments on NTS water resources. These included:</p> <ul style="list-style-type: none"> • Provide detail regarding the contamination of groundwater with physical data and show that the statement that "much of the radioactivity exclusive from tritium, remains captured in the original cavity, and thus not available to leach into the groundwater" is valid. • Concern that U-238 and tritium will be used in test shots because use of U-238 and tritium are not included in water permit. • Concern regarding DOE's ability to accurately characterize groundwater contamination and migration within the 300-square miles under NTS. 	215, 587, 1048, 1219	Section 4.3.5
TTR	<p>Commentors provided specific comments on TTR water resources. These included:</p> <ul style="list-style-type: none"> • Expressed that water is not an issue in the TTR area and that there is enough to support the complex. • There is commitment to protect the aquifer. 	534, 1212, 1213	Sections 4.4.4, 4.4.5
Pantex	<p>Commentors provided specific comments on Pantex water resources. These included:</p> <ul style="list-style-type: none"> • Concern about the project's impact on the water supply of the Ogallala Aquifer in reference to agriculture and potable water. • Concern about severe water shortage in Texas. • Concern about ecological effects to scarce water resources in the Great Basin. • Concern about impacts on water resources. • Stated that water impacts must be examined individually and cumulatively for each alternative. • Provide long-term ecological effects of leaving radioactive and chemical contaminants that may pollute water resources while other facilities are being built. 	153, 325, 388, 475, 700, 701, 757, 892, 893, 789, 1205, 1206, 1051, 1212, 1219, 1217, 1222, 1223, 1224	Sections 4.5.5, 4.5.7, 5.5.4, 5.5.7
SNL	Commentor questioned the anticipated impact on downstream cities when the aquifer is dried up.	1215	Section 4.6.5
WSMR	Commentor is concerned about the water supply contamination from WSMR activities.	1218	Section 4.7.5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
SRS	<p>Commentors provided specific comments on SRS water resources. These included:</p> <ul style="list-style-type: none"> • Determine/ensure compliance of operations with current NPDES permit (i.e., Hg effluents). • Expressed concern on the Jasper-Beaufort Water District, which is measuring around 600pCi/L of tritium in the drinking water, which is a direct result of the current inventory and stockpiles of weapons-grade nuclear materials. • Concern about existing groundwater contamination as a result of tank residues. • Concern about cleanup/remediation of aquifer near SRS. • Concern about danger of further contamination of SC or GA water supply due to releases by SRS. 	405, 511, 572, 783, 1208, 1209	Sections 4.8.5, 10.5, 10.6.5
Water Resources			
Water Resources—General	Commentor stated that the groundwater around Rocky Flats is polluted, and needs to be cleaned up.	1217	Section 4.6.5
SRS	Commentor expressed concern about previous contamination of SRS and expressed a specific concern regarding the threat posed by tank residues to groundwater.	404	Section 5.8.5, 5.8.11
Geology and Soils			
Geology and Soils—General	Commentors expressed concern for the loss of fertile soils used for agriculture.	947	Sections 4.x.6 for all sites
LANL	<p>Commentors provided specific comments on LANL geology and soils. These included:</p> <ul style="list-style-type: none"> • Concern for the approximately 50,000 drums of TRU waste stored in tents at TA-54, one mile upwind from White Rock; an earthquake could cause drums to rupture and release approximately 1/4 of above-ground TA-54 radioactivity. • Seismic issues at LANL need to be adequately analyzed as most environmental assessments appear to be in significant error. 	6, 281, 947, 1177, 1217, 1218	Section 4.1.6, 4.1.6.3, 4.1.13, 5.1, 5.1.14, Chapter 7, Section 9.1
LLNL	Commentors expressed concern for the 7 million people that live in a 50-mile radius of LLNL where the main site is 200 feet from earthquake faults and Site 300 has a fault running through it.	9, 300, 320, 692	Sections 4.2, 5.2, 4.2.6.3

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
NTS	<p>Commentors provided specific comments on NTS geology and soils. These included:</p> <ul style="list-style-type: none"> • Need to determine the existing soil contamination data throughout NTS, surrounding areas, and areas downwind. • Soil analysis data should contain the inventory of radionuclides present at various depths to a depth of at the very least 20 cm. • Concern that the NTS area has experienced 620 earthquakes in the last 20 years with the largest a magnitude of 5.6. An earthquake with a magnitude of 7 is possible. Discuss how design of facilities can be built to prevent damage and radiological releases. NTS should not be considered for plutonium operations and SNM consolidation because of seismic activity. 	47, 215, 587, 1048, 1221	Sections 4.3, 4.3.6.2, 4.3.11, 5.3, 10.5, 10.6
SRS	Commentors expressed concern regarding location of SRS, which is located within proximity to a fault line responsible for the Charleston earthquake of 1868.	1208	Sections 4.8, 4.8.6
Y-12	Commentors stated that fractured limestone with caverns, fissures, sinkholes make recovery from project construction and operations impossible.		Sections 4.9, 5.9
Biological Resources			
Biological Resources—General	Commentors suggested that DOE consider the ecology and environment and characterize any changes to the Complex in order to take remedial action, if necessary. Commentors also expressed concern regarding explosive testing effects on T&E species.	459, 1225, 1189	Sections 4.x.7 for all sites, 5.x.7 for all sites
NTS	Commentor suggested that DOE explore whether various plants and animals within and near NTS have radionuclide concentrations.	1048, 215	Section 4.3.7
Cultural and Archaeological Resources			
Native American Resources	Commentors suggested that an assessment of the possible endangerment of the Native Americans and other indigenous people be considered. Numerous commentors were concerned about activities occurring on Native American lands or taking advantage of indigenous/aboriginal people and stated that Native Americans have been wiped out from nuclear material contamination.	104, 538, 1111, 1216, 1217	Sections 5.x.8 for all sites
Western Shoshone	Commentors stated that the SPEIS must include an explanation of how U.S. government and Shoshone Nation Agreement in the Treaty of Ruby Valley of 1872 can be ignored. The SPEIS must	9, 215, 763, 1048, 1223	Section 4.3.8

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	also include how gradual encroachment (as the ICC alleged and was upheld by the Supreme Court) is a plausible reason for taking of Shoshone land when that is the ruling of only one Nation (the US). The IACHR and UNCERD decisions that the U.S. was unjust in the taking of land need to be considered.		
LANL	Commentors stated that the Jemez Mountain range is the ancestral homeland to the surrounding Sovereign Pueblo Nations and should be considered in the analysis of LANL.	538, 1056	Sections 4.x.8 for all sites, 5.x.8 for all sites
Socioeconomic Resources			
Socioeconomic Resources—General	<p>Commentors provided comments on socioeconomic resources that were general in nature. These included:</p> <ul style="list-style-type: none"> • Define the size of the workforce and the socioeconomic impacts to all proposed sites for the consolidated plutonium center, assembly/disassembly, hydrodynamic testing and sub-critical testing. • Create jobs and security through devising cleanup activities. • Consider the impacts to American exports abroad as a result of the use and development of nuclear weapons. • Consider whether the community is tied too closely to a dangerous and unstable industry and thus unable to attract other jobs, investments, and residents. • Concern that decision to support project are based on financial reasons (no other opportunity for local area employment) versus making decisions based on health. • Perform careful studies of the economies, populations, and tax structures of existing nuclear communities compared to similar but non-nuclear communities. • Concern that Complex Transformation would devastate real estate values and businesses. • Stated that New Mexico dependence on nuclear industry is not entirely true. • Provide an analysis of economic impacts to businesses from a nuclear incident. • Socioeconomic scope must be broader and include more factors relating to regional socioeconomic characteristics. • Perform assessment of socioeconomic impacts to local 	4, 327, 328, 376, 616, 747, 1125, 1208, 1209, 1210, 1217, 1218, 1224, 1125	Sections 4.2.9 for all sites, 5.x.9 for all sites

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>communities.</p> <ul style="list-style-type: none"> • Provide information on how many jobs will be lost from consolidation to one site. • Consider benefits from direct and indirect jobs, taxes and payments in lieu of taxes (PILT). • Consider whether too much of the land in the community would be taken up by the project and not be available for other economic uses and whether the jobs created would be relatively few and unstable jobs done for the most part by contractors. • Overall socioeconomic impact to local communities should be included as an evaluation criterion for deciding on a specific site. • Realistic estimates of increased/decreased workforce, identification of support industries and businesses that would be added/reduced, as well as indirect impacts to county infrastructure should be included. 		
LANL	<p>Commentors provided specific comments on LANL socioeconomic resources. These included:</p> <ul style="list-style-type: none"> • Stated that budgeted \$155 billion will benefit New Mexico with jobs and status and economic development. Benefit would be marginal. • Stated that for the past 20 years NM has received more net federal spending per capita, much military, yet social, environmental, and economic well-being have declined. Complex Transformation claims the budgeted 155 billion dollar project will benefit NM with jobs and status and economic development. How will it be different from past funding? • Concern about the Santa Fe tourism industry. 	10, 84, 146	Sections 5.1.9
NTS	<p>Commentors were concerned about how the employment profile would be affected since weapons assembly and disassembly would be a new activity at NTS and given the stated need to reduce the nuclear stockpile and update stockpile weapons. It should be assumed that the workforce for NTS would come from Nye County.</p>	1048, 1125, 215	Sections 4.3.9, 5.3.9

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
TTR	<p>Commentors provided specific comments on TTR socioeconomic resources. These included:</p> <ul style="list-style-type: none"> • Stated that the loss of 100-150 jobs will reduce resources and services in Tonopah and other Northern Nye and Esmeralda County communities. Commentor requests that the ROI take into account not only Tonopah but surrounding rural communities. • Expressed concern that closing TTR would significantly impact local community. Tonopah does not have the economic base to retain citizens within the community if jobs at TTR are lost. 50 percent of volunteers/organization members are County/State/TTR employees and 50 percent of the Tonopah Volunteer Fire Department is TTR employees. Mitigation measures should be presented for both adverse and beneficial impacts. • Consider that funds required to keep TTR operational are lower than facility upgrades at other sites. • Address impacts from continuation of operations at NTS and TTR using workforce primarily outside of Nye County; continuation and/or addition of operations using more workforce and resources from Nye County; and discontinuation or reduction of operations at NTS and TTR. 	724, 793, 858, 1125, 1197, 1196, 1213	Sections 4.4.9, 5.4.9, 5.15.4.2
SNL	<p>Commentor stated that for the past 20 years NM has received more net federal spending per capita, much military, yet social, environmental, and economic well-being have declined. Complex Transformation claims the budgeted 155 billion dollar project will benefit NM with jobs and status and economic development. How will it be different from past funding? Another commentor expressed concern about the tourism industry in Santa Fe.</p>	84, 146	Sections 5.6.9
Pantex	<p>Commentor stated that Pantex is a valuable economic asset for the region.</p>	1212	Sections 4.5.9, 5.5.9
SRS	<p>Commentors stated that SRS employees fill a variety of community service positions and that the CPC will employ over 2,500 people.</p>	923, 924, 1209	Sections 4.8.9, 5.8.9
Y-12	<p>Commentors supported the operations at Y-12 and stated that Y-12 has a tremendous economic impact on the region.</p>	463, 940, 941, 917, 918, 1198	Section 4.9.9, 5.9.9
Environmental Justice			

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
Environmental Justice— General	<p>Commentors provided comments on environmental justice resources that were general in nature. These included:</p> <ul style="list-style-type: none"> • Stated that the poorest communities bear most impacts. • Studies to ensure the poor/minority/disabled populations aren't suffering the brunt of emissions must be included. • Environmental justice analysis for transportation routes and disposal areas, private and public, needs to be included. • Provide an EJ analysis in case pueblos have to be abandoned for all options including LANL. • Include analysis of impacts to young children and women; health impacts related to exposure to radiation and other contaminants generated during the proposed activities (i.e., cancer fatalities, non-cancer effects, non-fatal instances of cancer, and psychological impacts); health impacts from the entire life cycle (including transportation); and health impacts from pathways used by indigenous people. 	Campaign 2, Campaign 8, 5, 76, 451, 536, 678, 715, 646, 653, 943, 1068, 1152, 1156, 1178, 1190, 1191, 1217	Sections 4.x.10 for all sites, 5.x.10 for all sites, 5.10
LANL	Commentors stated that operations at LANL are a major violation of environmental justice. New Mexico has the second highest minority population in the country and it is not possible that LANL activities would have no effect on these populations. Environmental justice issues in NM must be analyzed.	5, 260, 1056, 1221	Sections 4.1.10, 5.1.10
NTS	Commentors stated that the SPEIS should consider potential impacts on eastern Nevada, southern Nevada, western Utah, areas previously subject disproportionately to exposure to radiation from above and vented underground nuclear weapons tests.	302	Sections 4.3.9, 5.3.9
SNL	Commentors stated that DOE must analyze for the many environmental justice issues in NM.	5	Sections 4.6.9, 5.6.9
SRS	Commentor requested that an assessment of impacts from high levels of tritium in Savannah River to subsistence fishermen/women (i.e., especially those women who are pregnant and subsist on a diet primarily consisting of fish from the Savannah River) be included. Commentor also suggested that DOE consider adverse impacts to at-risk (minority or low-income) populations.	1209	Section 5.8.10
Health and Safety			

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
Health and Safety—General	<p>Several commentors provided comments on health and safety that were general in nature. These included:</p> <ul style="list-style-type: none"> • Concern about daily risks associated with operations. • Include the results of epidemiologic studies of radiation health of workers and communities, updating its Comprehensive Epidemiologic Resource program of the early 1990's. • Commentors expressed that the government should not consider the production of new nuclear weapons while we still are struggling to address past risks to the health of those living near or working in the weapons complex. • Suggested that cancer incidence published by the BEIR VII report for its cancer estimates since the report provides the most recent scientific assessment by the National Research Council. • Stated that nuclear weapons production poses a significant health hazard for workers and a human health risk assessment should be included in the SPEIS. • Requested that lethal dose of nuclear weapons in relation to human life be included. • Concern about increased incidence of cancer in surrounding communities due to increased exposure to radioactive materials from Complex Transformation. • Evaluate impacts to the worker, community, and environmental health from daily operations, emissions, and potential accidents associated with plutonium pit manufacturing. • Concern that the CPC would have similar or more detrimental effects on the environment and to surrounding communities than did Rocky Flats Plant. • Provide analysis of long-term environmental and public health effects of plutonium pit production. 	<p>Campaign 18, Campaign 20, 3, 4, 6, 31, 38, 39, 47, 96, 104, 111, 125, 129, 138, 145, 152, 153, 157, 190, 191, 203, 209, 210, 214, 268, 303, 324, 332, 337, 340, 344, 367, 386, 390, 395, 398, 405, 421, 422, 440, 460, 478, 504, 525, 541, 543, 557, 562, 564, 593, 571, 578, 594, 599, 611, 663, 668, 671, 673,</p> <p>674, 675, 678, 684, 698, 715, 719, 743, 747, 751, 767, 777, 781, 789, 811, 812, 872, 877, 954, 1083, 1101, 1102, 1104, 1126, 1128, 1135, 1152, 1156, 1183, 1202, 1208, 1209, 1210, 1212, 1217, 1218, 1219, 1215, 1222, 1223</p>	Sections 5.x.11 for all sites, Chapter 6, Appendix C
LANL	<p>Commentors provided specific comments on LANL health and safety. These included:</p> <ul style="list-style-type: none"> • Concern about health and safety issues at LANL. • Concern over elevated levels of americium in the northern foothills of Sangre de Cristo Mountains downwind from LANL. • Radioactive debris associated with uranium mining in NM 	6, 209, 536, 538, 684, 777, 1216, 1218, 1221, 1223	Sections 4.1.7, 5.1, 5.1.11

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>continues to be a significant source of sickness and premature death.</p> <ul style="list-style-type: none"> • LANL has a poor history of providing adequate health and safety to workers and the community. • Concern about increased incidence of cancer in surrounding communities due to increased exposure to radioactive materials from increased operations at LANL. 		
LLNL	<p>Commentor expressed concern about increased risk to public health as the population has grown significantly in the area surrounding the site.</p> <p>Commentor expressed concern about additional tritium activity.</p>	27, 692	Sections 5.12, 5.13, 5.14
NTS	<p>Commentors expressed concern for worker and the surrounding community's exposure to weapons assembly and disassembly activities and suggested that health implications for workers and the surrounding communities be addressed.</p>	4, 215, 302, 587, 1048, 1213	Section 5.3.11
Pantex	<p>Commentors requested that worker, community and environmental health impacts from daily CPC operations and emissions be evaluated and also to provide impacts to the Pantex region and nation if there were to be a nuclear detonation at Pantex.</p> <p>Commentors suggested that Pantex expansion needs to be conducted in a way that will not impair the health and safety of area residents or have adverse effects on the environment.</p>	64, 184, 167, 330, 700, 884, 885, 1224	Section 5.5.11
SNL	<p>Commentor requested that each facility be identified and a description of what levels will increase at each facility that will be involved in the new Complex Transformation and provide the risks to the public.</p>	1217	Sections 5.13, 5.14, 5.16, 5.17
SRS	<p>Commentor expressed concern that there is currently no monitoring of any radionuclide releases from SRS. Commentor suggested that a characterization study should be performed to account for the number of people who have been affected physically (health-wise) and who have died as a result of what is occurring at SRS.</p>	1209	Sections 4.8.4, 4.8.5, 4.8.11
Transportation			
Transportation—General	<p>Several commentors provided comments on transportation that were general in nature. These included:</p> <ul style="list-style-type: none"> • Concern for the potential for release of materials during 	Campaign 14, 4, 104, 153, 329, 376, 383, 451, 546, 571, 606, 672, 674, 861, 725, 754, 1044,	Sections 1.5.4.1, 5.x.13 for all sites, 5.10

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	<p>transportation accidents that would threaten the environment and human health/safety.</p> <ul style="list-style-type: none"> • Suggested that the transportation of plutonium should not occur until it is decided that it will not be moved again. • Consider transportation issues in/out of facilities and the need to bolster local security and emergency response capabilities. • Assess environmental and security risks associated with transportation of SNM as well as transport of nuclear bombs and bomb components. • Explain how ongoing transfers of SNM will not prejudice decisions yet to be made under the Complex Transformation SPEIS. 	1188, 1209, 1210, 1220	
LANL	<p>Commentors provided specific comments on LANL transportation. These included:</p> <p>Commentor suggested that quantities of hazardous materials shipped through the local airports be included.</p>	1225	Section 5.1.12
LLNL	<p>Impact analysis on traffic volumes and congestion of California highway system traffic analysis should be prepared.</p>	945	Section 5.212
NTS	<p>Commentors suggested considering the transportation of SNM and weapons into and out of NTS and its impacts to the surrounding region including Nevada highways and communities.</p> <p>Commentor suggested that the SPEIS assess cumulative impacts and risks to NV highways and communities from transportation of materials and wastes due to current NTS activities, the Yucca Mountain repository program, and Complex Transformation.</p> <p>Commentors suggested that rail transport of SNM at NTS offers security advantages over highway transport.</p>	4, 173, 215, 302, 546, 587, 1048, 1213	Sections 5.3.13, 5.10
TTR	<p>Commentor stated that transportation routes at TTR are well maintained due to the rural location, accidents are at a minimum.</p>	534	4.4.12
Pantex	<p>Given the proximity of the airport to Pantex, constant air traffic, and addition of more dangerous operations, the consequences of accidents should be evaluated.</p>	167, Campaign 20, 884, 954, 789, 1224	Section 5.10

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
SNL	<p>Commentors provided specific comments on SNL transportation. These included:</p> <ul style="list-style-type: none"> • Several questions regarding how materials will be transported, how much will be transported, who will be notified, and can safety be guaranteed. • Provide information on how the production of more nuclear weapons will affect the storage dump at KAFB. • Stated that use of Interstate 3 for transport of nuclear materials is not acceptable and questioned if DOE has been a party to the proposal to build Interstate 3. 	1210, 1217	Sections 5.8.12, 5.17
SRS	<p>Commentor questioned whether there will be international traffic in nuclear materials through the Port of Savannah as part of Complex Transformation or other DOE programs.</p>	1209	
Waste Management			

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
Waste Management— General	<p>Several commentors provided comments on waste management that were general in nature. These included:</p> <ul style="list-style-type: none"> • Concern about the storage location of the significant amount of waste generated from tritium production when the current storage sites remain radioactive and environmental threats. • SPEIS needs to include its current plans for disposing of radioactive waste and account for new research showing that synthetic zircons used to contain plutonium-rich materials are much less durable than previously thought. • Consider storing all waste on-site. • Clarify how plutonium storage, handling, production, destruction, or use is interchangeable in GNEP and Complex Transformation. • Include an analysis of the environmental and human health impacts and the costs of decommissioning, cleaning up, and waste disposal for all facilities which DOE proposes to construct, as well as existing facilities that will be demolished as a result of the proposal and how this is "economically sustainable." • Storage at Yucca Mountain needs to be addressed. • What are some of the specific factors related to disposal of hazardous wastes on- and off-site (volumes, types, how, where, impacts)? • A plan for long-term storage and mobilization should be developed. 	<p>Campaign 12, Campaign 20, 4, 5, 103, 104, 111, 153, 303, 376, 401, 428, 433, 450, 516, 525, 544, 552, 553, 578, 562, 570, 674, 684, 712, 735, 741, 789, 954, 1208, 1209, 1210, 1211, 1218, 1217, 1218, 1220, 1222, 1223, 1224,</p>	<p>Section 5.x.14 for all sites, 6.3.2</p>
LANL	<p>Commentors provided specific comments on LANL waste management. These included:</p> <ul style="list-style-type: none"> • Resuming pit production will significantly contribute to existing risks associated with waste management (generation, disposal, and storage). • Concern for use of 'transportainers' as temporary vaults of fissile material at TA-55. • Comment on impacts from improper waste storage at LANL, including what would happen in event of a large fire or weather event. 	<p>Campaign 12, 5, 6, 67, 111, 260, 300, 324, 769, 781, 947, 1218, 1221, 1223</p>	<p>Sections 5.1.14</p>

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	<ul style="list-style-type: none"> Explain the effects caused by rejected pits to the waste stream. The SPEIS must analyze for the impacts of LANL becoming the second transuranic waste disposal facility in NM. Address how NNSA proposes to deal with the huge nuclear waste dump on the Pajarito Plateau. Explain how NNSA intends to deal with the 12,500 drums of nuclear waste at Area G buried before 1971 that are currently contaminating the aquifer under LANL. LANL has inadequate waste storage practices with waste stored in temporary areas i.e., tents in fire-prone areas. 		
LLNL	Commentors expressed concern that the LLNL site has been environmentally contaminated for years and cleanup is far from over.	692, 1222	Section 5.2.14
NTS	<p>Commentors questioned if the radioactive material from weapons assembly and disassembly would be disposed of or stored at NTS.</p> <p>Commentors suggested that the nature of management of SNM be described (where and how, what volume, and the radioactive inventories that could be anticipated) be incorporated into the document, and for the document to also evaluate to what extent NTS would be a consolidation site.</p> <p>Commentors also suggested that disposal of material associated with sub-critical testing be addressed.</p>	4, 215, 302, 587, 1048	Section 5.3.14
Pantex	<p>Commentors requested a discussion of emissions and waste streams generated; facilities needed; disposal options; and waste processing or storage at Pantex.</p> <p>Commentors also expressed concern about safety with regards to waste management at Pantex.</p> <p>Commentors stated that the proposed expanded operations would generate 25,000 cubic meters of TRU and WIPP only has space for 17,130 cubic meters, the excess would have to be left on-site, either in Area G or in the canyons that flow into the Rio Grande.</p>	388, 330, 789, 1217, 1224	Sections 5.5.14, 10.5.5

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
SNL	<p>Commentor expressed concern on the ability of the current Hazardous Waste Management Facility at SNL to handle the increased quantities of RCRA hazardous waste (up from ~53K kilos) and infrastructure related wastes (~175K kilos/yr) and questioned how the facilities will be decontaminated.</p> <p>Another commentor expressed concern for mixed waste dumps found on land planned for housing projects.</p>	1216, 1217	Section 5.17
SRS	<p>Commentors requested that DOE assess incremental impact of managing TRU, LLW, and HLW due to the siting of the project at SRS.</p> <p>Another commentor requested that the need for plutonium storage facilities apart from the current KAMS facility must be examined from an environmental, security, and cost perspective</p>	572, 1188, 1209	Section 5.8.14
Y-12	Commentor suggested considering the disposition of the radioactive materials and how they will be staged, stored, or used in manufacturing at Y-12.	463, 1147, 1210	Section 5.9.14
Facility Accidents			
	<p>Commentors provided comments regarding the analysis of facility accidents that were general in nature. Commentors were generally concerned about the danger of facility accidents. Other commentors suggested:</p> <ul style="list-style-type: none"> • Including the basis for its estimates of the probabilities of accidents so that the public can comment upon the reasonableness of the estimates. • Including information on the ability of the nuclear weapons complex to respond to a problem with a deployed warhead. • For severe accident consequences (i.e., large fires involving plutonium or facility-wide plutonium spill) a part of the risk analysis between alternatives should be a comparison of the consequences, given that the event occurs. • Providing a reasonable scenario of an unanticipated event. • The SPEIS should include an estimate of the consequences to the present national nuclear posture in the case that a severe event (i.e., facility wide plutonium spill) would occur, and an 	3, 4, 138, 562, 770, 1218, 1209	Sections 5.x.12 for all sites, Appendix C, Appendix H

Table D.2-2—Summary of Scoping Comments (continued)

Topic 15. Resources

Subtopic	Comment Summary	Documents	SPEIS Reference
	evaluation of whether the entire site would have to be abandoned or closed, or whether parts of operation could be continued in some locations, etc.		
LANL	<p>Commentors provided specific comments on facility accidents at LANL and their concern regarding the occurrence of facility accidents at LANL. Some commentors suggested:</p> <ul style="list-style-type: none"> • Provide a description of consequences of major spills at LANL or major fires in terms of cancer deaths. • Extending accident analysis radius to include impacts on Albuquerque for all alternatives including LANL. • Providing a detailed analysis of the consequences of severe plutonium releases on the Rio Grande, on the economy and society of nearby communities, of NM, and of states near NM for all alternatives including LANL. • Including an estimate of consequences to economy and society of NM in case of severe event for all alternatives including LANL. 	3, 781, 1223	Sections 5.1.5, 5.1.9, 5.1.10, 5.1.11, 5.1.12, Appendix C

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
General Support for Complex Transformation	Commentors provided statements in support of the Complex Transformation proposal.	6, 73, 576, 580, 1209, 1218, 166, 171, 331, 305, 310, 311, 366, 416, 539, 545, 568, 576, 580, 759, 794, 775, 784, 960, 1208, 1209, 1218, 1222	Comment noted.
Support for the No Action Alternative	Commentor supports the No Action Alternative	1220	Comment noted.
Support for CNPC	Commentors provided statements in support of a CNPC as it would offer advantages in environmental impact, security, cost, shipping, waste management, and technical support.	73, 535, 539, 941	Comment noted.
Support for the Capability-Based and Reduced Operations Alternative	Commentors provided statements in support of the Capability-based and Reduced Operations alternative as it has significant advantages over DCE and CNPC alternatives, including no new facility construction, no increase in Pu production, reduction in # of sites with Category I/II SNM, reductions in production capacity at certain sites, and continued D&D.	460, 322	Comment noted.
Support for Siting at LANL	Commentors provided statement in support of siting at LANL because pit production would provide legitimacy for LANL.	6, 49	Comment noted.
Support for Siting at LLNL	Commentors provided statement in support of siting at LLNL because LLNL has the best combination of scientific capabilities and scientific staff in the United States and it has a long, thoroughly demonstrated track record of accomplishments that are second to none.	201, 1221, 1222	Comment noted.
Support for Siting at NTS	Commentor provided statements in support of consolidating SNM to fewer locations, nuclear storage, HE R&D, and hydrotesting at NTS.	44, 534, 576, 1213	Comment noted.
Support for Siting at Pantex	Commentor provided statements in support of keeping site plutonium functions where storage and handling capability already exists.	64, 202, 282, 493, 506, 884, 885, 1067, 1201, 1202, 1203, 1204, 1212, 1218	Comment noted.
Support for Siting at SRS	Commentor provided statements in support of siting at SRS. Nearly 90 percent of the land at SRS is open and free of the encroachment issues compared to other DOE sites and SRS has the established	36, 73, 199, 288, 290, 299, 304, 331, 364, 365, 366, 419, 420, 459, 523, 522, 523, 632, 657, 730, 755, 792, 912, 913, 914, 915, 916, 917, 918,	Comment noted.

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
	infrastructure to support operations of Complex Transformation.	919, 920, 921, 922, 923, 924, 926, 927, 928, 929, 930, 931, 932, 933, 934, 936, 948, 958, 959, 960, 961, 1055, 1208, 1209	
Support for Siting at Y-12	Commentors provided statements in support of siting Complex Transformation at Y-12 because Y-12 is acknowledged as America’s center of uranium excellence.	Campaign 11, Campaign 13, 46, 90, 98, 199, 205, 206, 222, 223, 226, 261, 298, 416, 417, 518, 520, 521, 532, 547, 580, 628, 630, 640, 661, 706, 707, 709, 711, 713, 714, 733, 736, 739, 742, 759, 773, 775, 784, 788, 795, 856, 871, 873, 874, 875, 880, 881, 956, 786, 788, 969, 956, 1088, 1122, 1147, 1170, 1198, 1211	Comment noted.
Opposition to Complex Transformation	Commentors provided general statements in opposition to the Complex Transformation proposal.		Comment noted.
Campaign 3, Campaign 4, Campaign 6, Campaign 7 Campaign 8, Campaign 10, Campaign 15, Campaign 16, 1, 10, 11, 12, 13, 17, 21, 22, 23, 25, 50, 51, 52, 54, 55, 56, 57, 58, 59, 60, 61, 62, 67, 80, 94, 95, 157, 158, 159,160,161,162, 165, 168, 170, 172, 174,175,176, 177, 178,180, 179, 181, 182, 183, 185, 186, 187, 189, 190, 192, 193, 194, 195, 196, 197, 199, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 262, 278, 279, 280, 281 330, 536, 1048, 104, 63, 65, 66, 68, 74, 72, 69, 71, 75, 76, 216, 219, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 283, 284, 285, 286, 287, 291, 292, 332, 334, 335, 336, 337, 338, 340, 341, 346, 347, 349, 351, 352, 353, 354, 355, 356, 357, 359, 361, 368, 387, 390, 391, 392, 394, 395, 397, 400, 401, 402, 403, 406, 407, 409, 410, 411, 412, 413, 414, 421, 422, 427, 428, 430, 429, 431, 432, 433, 436, 437 , 440, 441, 442, 443, 445, 541, 542, 543, 544, 549, 550, 551, 553, 554, 555, 546, 140, 141, 142, 143, 144, 145, 293, 297, 300, 301, 306, 307, 308, 309, 312, 313, 315, 316, 317, 318, 319, 321, 323, 370, 371, 372, 373, 374, 375, 378, 379, 380, 381, 382, 383, 384, 446, 447, 448, 449, 450, 452, 453, 454, 455, 456, 457, 461, 462, , 1082467, 468, 469, 470, 471, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 492, 495, 496, 497, 498, 499, 500, 501, 502, 504, 585, 588, 589, 591, 592, 593, 572, 575, 577, 578, 579, 581, 582, 583, 584, 556, 557, 559, 560, 561, 562, 564, 565, 567, 569, 570, 594, 111, 113, 114 115, 116, 117, 118, 120, 596, 597, 598, 595, 598, 599. 600, 662, 664, 665, 666, 667, 668, 669, 670, 672, 673, 674, 675, 676, 846, 847, 848, 849, 850, 851, 852, 853, 855, 857, 860, 854, 677, 678, 679, 680, 681, 682, 683, 686, 687, 688, 689, 690, 691, 726, 725, 727, 729, 732, 734, 148, 149, 151, 152, 154, 153, 125, 129, 130, 137, 138, 139, 146, 147, 723, 738, 740, 743, 744, 746, 747, 748, 751, 752, 753, 754, 756, 758, 524, 525, 526, 527, 528, 529, 533, 535, 540, 508, 509, 510, 514, 515, 601, 602, 603, 604, 605, 606, 608, 609, 610, 611, 612, 613, 614, 615, 617, 618, 619, 620, 621, 622, 623, 625, 626, 629, 631, 633, 635, 636, 637, 638, 639, 642, 644, 645, 646, 647, 649, 651, 653, 656, 658, 659, 660, 876, 878, 888, 889, 891, 892, 893, 894, 906, 907, 897, 898, 899, 900, 901, 902, 903, 904, 905, 760, 762, 764, 765, 766, 767, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 966, 970, 971, 972, 975, 976, 977, 978, 979, 980, 951, 953, 955, 957, 963, 964, 1077, 1078, 1079, 1080, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 1081, 1085, 1086, 1090, 1091, 1093, 1096, 1097, 1098, 785, 787, 790, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 1105, 1106, 1107, 1109, 1110, 1112, 1113, 1114, 1115, 1116, 1117, 1119, 1120, 770, 771, 772, 777, 781, 782, 783, 1123, 1126, 1130, 1131, 1133, 1134, 1136, 1137, 1138, 1139, 1140, 1141, 1145, 1148, 1149, 1150, 1151, 1153, 1154, 1151, 1157, 1158, 1159, 1160, 1161, 1163, 1164, 1165, 1166, 1205, 1210, 1219, 937, 943, 944, 945, 947, 949, 950, 906,908, 909, 910, 911, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1041, 1041, 1043, 1045, 1046, 1047, 1049, 1050, 1052, 1053, 1054, 1056, 1057, 1059, 1060, 1061, 1064, 1065, 1068, 1069, 1070, 1071, 1167, 1168, 1169, 1171, 1172, 1173, 1175, 1176, 117, 1178, 1180, 1181, 1182, 1184, 1186, 1189, 1191, 1192, 1194, 1199 1212, 1211, 1213, 1224, 1217, 1220, 1219, 1215, 1221, 1216, 1222, 1223			

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
Opposition to Siting at LANL	<p>Commentors provided statements in opposition to siting at LANL. Statements included general statement of opposition. Other commentors opposed because of:</p> <ul style="list-style-type: none"> • Commentors support of increased cleanup. • LANL has had chronic safety and security issues and history of environmental contamination. • LANL's proximity to populated areas. • LANL's violations of the Clean Air Act. • Instances of contaminated groundwater and stormwater. 	3, 6, 259, 260, 264, 590, 616, 624, 682, 777, 1128, 1218, 1220	Comment noted.
Opposition to Siting at LLNL	Commentors provided statements in opposition to siting at LLNL. Statements included general statement of opposition.	9, 26, 156, 164	Comment noted.
Opposition to Siting at NTS	Commentors provided statements in opposition to siting at NTS. Statements included general statement of opposition.	47, 155, 587	Comment noted.
Opposition to Siting at SRS	<p>Commentors provided statements in opposition to siting at SRS. Statements included general statement of opposition. Other commentors opposed because:</p> <ul style="list-style-type: none"> • SRS has poor soil characteristics. • SRS is located above a major aquifer and located near an important river system. • Commentor supports accelerated dismantlement activities of aging stockpile weapons. • SRS has relatively high earthquake risk. 	405, 572, 1208, 1218	Comment noted.
Opposition to Siting at Pantex	Commentors stated that DOE should not include Pantex as a candidate site for consolidation, relocation, or elimination.	64, 169, 289, 494, 507, 757, 1051, 1224	Comment noted.
Opposition to Siting at SNL	Commentors stated that DOE should not include SNL as a candidate site for consolidation, relocation, or elimination.	512, 1215, 1216	Comment noted.

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
Opposition to Siting at Y-12	Commentors stated that DOE should not include Y-12 as a candidate site for consolidation, relocation, or elimination.	187, 342, 398, 607, 809, 1210, 942	Comment noted.
Divine Strake Environmental Assessment	Commentor submitted comments on the preparation of the Divine Strake Environmental Assessment being prepared at NTS.	263	The Divine Strake Environmental Assessment is a NEPA analysis being prepared independent of the Complex Transformation SPEIS.
Other Projects and Sites	<p>Commentors provided comments on other projects or sites. Comments included:</p> <ul style="list-style-type: none"> • Construction of a biological weapons complex. • National Bio and Agro Defenses- hydrodynamic testing in relation to the City of Tracy in California. • Issues at Yucca Mountain. • Cumulative and synergistic impacts of GNEP and Transformation on one community and environment should be incorporated into one single NEPA analysis. 	29, 385, 735, 1219, 1220, 1223	Comments on other projects and sites are beyond the scope of this SPEIS. The GNEP PEIS addresses use of nuclear energy for the commercial generation of electricity. This SPEIS deals with the weapons complex as related to national security. Cumulative impacts are discussed in Chapter 6 of this SPEIS.
Moral and Ethical Issues	<p>Commentors provided comments regarding general moral/ethical implications of the Complex Transformation proposal. Comments included:</p> <ul style="list-style-type: none"> • The support of sustainable interactions among people and the Earth. • Request for the consideration of karmic forces when following through with the transformation. • Complex Transformation regresses in reasserting America's moral heritage and imperils the pursuit of "Life, Liberty, and the Pursuit of Happiness." • Lyrics to "What a Wonderful Life." • Suggest teaching diversity and non-violence as alternatives to building nuclear weapons and promote peace. 	Campaign 8, 9, 10, 11, 24, 40, 65, 66, 70, 76, 204, 218, 228, 268, 276, 317, 351, 390, 421, 429, 515, 544, 555, 582, 584, 595, 670, 672, 850, 854, 681, 690, 721, 734, 829, 796, 998, 1003, 1217, 1222, 1223	Comment noted.
Proliferation and Nonproliferation	Commentors submitted comments stating that Complex Transformation increases global proliferation of nuclear weapons and hinders	31, 18, 6, 5, 3, 741, 9, Campaign 18, 65, 67, 80, 81, 85, 87, 88, 701, 91, 75, 153, 303, 315, 332, 338, 344, 348,	Comment noted.

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
	nonproliferation	349, 355, 356, 359, 361, 367, 387, 393, 401, 402, 404, 405, 406, 413, 424, 427, 433, 437, 439, 440, 441, 442, 443, 444, 525, 543, 549, 551, 554, 559, 560, 567, 586, 591, 593, 571, 577, 559, 111, 569, 663, 668, 669, 671, 673, 674, 675, 860, 686, 697, 701, 704, 705, 710, 715, 717, 718, 720, 725, 732, 738, 743, 747, 748, 751, 760, 761, 762, 765, 767, 771, 781, 787, , 803, 812, 817, 824, 883, 962, 1104, 815, 1105, 1218, 1208, 1209, 1210, 1046, 1217, 1220, 1222, 1223	
Criticism of the Current Administration and Policy	Commentors submitted comments criticizing the current administration and demanding a change in nuclear weapons policy.	4, 263, 571, 1222	The change in nuclear weapons policy and the current administration is beyond the scope of this SPEIS.
International Relations/Policy	Commentors submitted comments suggesting the Complex Transformation would increase danger of war with foreign countries and impact relations with foreign countries.	Campaign 4, Campaign 6, Campaign 14, 69, 76, 104, 128, 135, 132, 149, 263, 413, 515, 564, 639, 671, 747, 781, 1104, 1117, 1134, 1144, 1045, 1152, 1175, 1212, 1217, 1220, 1223, 1215, 1217, 1218, 1219	Comments dealing with international policy and relations with foreign countries are beyond the scope of this SPEIS.
Nuclear Weapons	<p>Commentors submitted comments regarding nuclear weapons and weapons of mass destruction.</p> <p>Commentor questioned what new threats would emerge that would require the production of new nuclear weapons. Other commentors provided suggestions regarding nuclear weapons. These comments suggested:</p> <ul style="list-style-type: none"> Addressing how NNSA is upholding its mission to reduce global danger of nuclear weapons by creating a new nuclear weapons production complex. Considering the increased threat of other countries getting and using nuclear weapons as a 	Campaign 14, 263, 460, 555, 735, 781, 861, 898, 952, 1135, 1188, 1218, 1223	Chapter 2

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
	<p>direct result of our resuming nuclear weapons production.</p> <ul style="list-style-type: none"> • Eliminating all tactical nuclear weapons that have the purpose of being used on the battlefield. • Committing to further reductions in the number of nuclear weapons. 		
Nuclear Power	<p>Commentors provided statements regarding nuclear power and skepticism of the consideration to expand nuclear energy.</p> <p>One commentor suggested that materials used for nuclear power not be used for the development of nuclear weapons.</p> <p>Commentors also suggested an alternative that researches non-nuclear, renewable energy.</p>	<p>Campaign 4, Campaign 6, 8, 77, 203, 214, 263, 310, 333, 386, 435, 555, 562, 570, 575, 699, 747, 851, 1208, 1209, 1215, 1218, 1219, 1220, 1222, 1223, 1224, 1225</p>	<p>This SPEIS deals with the weapons complex as related to national security not nuclear power.</p>
War on Terror	<p>Commentors submitted comments regarding what role U.S. nuclear weapons will have on the current war on terror.</p> <p>Commentors are concerned that the proposed project will invoke international fears of a U.S. first strike.</p> <p>Commentors also requested that DOE assess impacts of restarting a nuclear war.</p>	<p>4, 303, 735, 819, 838, 1218, 1219, 1223</p>	<p>Chapter 2, Chapter 3</p>

Table D.2-2—Summary of Scoping Comments (continued)

Topic 16. General

Subtopic	Comment Summary	Documents	Response/SPEIS Reference
IAEA Inspections in the U.S.	<p>Commentors stated that the U.S. should lead the way and be an example for other countries when dealing with nuclear weapons.</p> <p>One commentor questioned why the U.S. has not allowed IAEA weapons inspections; the consequences and benefits of allowing such inspections to take place; how such inspections by IAEA would support positive U.S. foreign relations; and who would benefit from the U.S. continuing to keep IAEA from inspecting the nuclear weapons arsenal.</p>	1, 5, 16, 17, 68	Chapter 2